



The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 2 - 17 November 2020

Comments of Suffolk County Council as Highways Authority

1. Comments on WRs

No applicable.

2. Comments on responses to RRs

Not applicable.

3. Comments on LIRs

Not applicable.

4. Comments on any SoCG

General comments

Glossary of Terminology: SCC has expressed an opinion that this should include the full definition of 'commencement' as written in the draft DCO to avoid ambiguity within the SoCG of when certain works will be started in particular those within the definition of onshore preparation works.

Clarification notes have been provided by the applicant for air quality and transport that seek to address some statements that are under discussion. The Councils will provide a full response at a later deadline but where possible an initial response has been given in part 6 of this document.

Many of the statements refer to monitoring and controls proposed by the applicant in the OCoCP, OCTMP or OWTP although these have not yet been defined or quantified. The principle of embedding controls in the management documents is not disputed but SCC will be seeking greater detail during the examination to ensure that these are acceptable.

ID	Topic	Statement	EA2 Ltd position	EA1N Ltd position	ESC position n/a	SCC position	Notes

5. Comments on responses to the ExAs Written Questions (ExQ1)

ExQs 1	Question to:	Question:	1	2	Applicants Response	SCC Comments
1.3.4		PA2008 s127 Statutory Undertakers' Land/ Rights				SCC seeks similar protection for its apparatus such as street lighting and highway drainage to that provided and access to those areas of highway temporary possessed by this order to ensure the authority can discharge its Highways Act (1980) s41 duties. If necessary it may seek protective provisions similar to those accepted for statutory undertakers.
1.4.18		Table 6.25 lists all the locations where the onshore cable route crosses the public highway and paragraph 366 says that "some crossing locations will require ... special crossing techniques ..." b) Is it intended that trenchless techniques be used where the onshore cable route crosses the public highway to minimise impacts on traffic and access to property?			b) It is intended that open trenching be used in all cases where the cable route crosses the public highway. The process for open trenching for road crossings, which will maintain traffic use at all times, is described in Chapter 6 Project Description (APP-054) sections 6.7.3.10.4 & 6.7.3.10.5. The Applicants therefore do not consider that trenchless techniques are necessary to cross these roads in this instance.	SCC notes that trenchless methods are less disruptive to the fabric of the highway and considers this is a more appropriate method. Road widening may affect footways adjacent to the highway or require removal of hedges. It does recognise that the presence of buried apparatus may in some circumstances make directional drill impractical.
1.4.19		Paragraph 343 mentions structural works to accommodate Abnormal Indivisible Loads" at Marlesford Bridge. a) What works are intended? b) How will the works be undertaken safely and			a) Abnormal indivisible load movements associated with delivery of the Projects' transformers will come from either Felixstowe port or	A) Over bridging was used on the A137 Wherstead Road Ipswich and required a weekend closure of the road the weekend before and after the AIL movement. Similar

		<p>without disrupting traffic on the A12? And c) will the works be temporary or permanent?</p>		<p>Lowestoft port. If the movements originate from Felixstowe, it may be necessary to undertake works to strengthen the A12 River Ore crossing. The need to strengthen the crossing would be further investigated once the chosen port is adopted. These investigations would consider if the crossing could accommodate the load (once the final loading is known) or if accommodation works will be required. Should accommodation works be required, the form of works would need to be agreed with SCC. It is likely that there will be potential for less disruptive mitigation (e.g. overbridging) that will not require substantial works durations</p> <p>b) As the scope of works is unknown at this stage and the scale of traffic management is to be determined, is it proposed that the Construction Traffic Management Plan (secured by Requirement 28 of the draft DCO (APP-023)) includes a commitment to consider the traffic delay as part of the detailed design work, including any required mitigation measures. As part of this process there will also be a requirement to agree the form of traffic management measures and satisfy SCC in their duty</p>	<p>disruption to the A12 would only be acceptable in very rare circumstances due to the lack of suitable diversion routes.</p> <p>B) SCC has difficulty envisaging how these works can be undertaken after the start of pre commencement works due to the disruption that temporary traffic management would cause to existing traffic, SZC traffic and SPR traffic. SCC would recommend that an implementation plan is included in the CMTP</p>
--	--	--	--	---	--

				under the Traffic Management Act 2004 to ensure traffic moves freely and quickly on their roads.	
1.5.13		R28 provides for a construction traffic management plan to be approved for stages of the connection works by the relevant planning authority. • Should the requirement include a clause to the effect that the works are to be carried out in accordance with the approved construction traffic management plans?		It is considered that Requirement 28(2) provides for this. It provides that: “The plans approved under paragraph (1) must be implemented upon commencement of the relevant stage of the onshore works.” This ensures implementation of the plans as-approved at each stage of onshore works.	The Applicant’s response is noted but SCC considers it important to ensure that onshore preparation works as well as construction works are brought within the scope of the CTMPs, and it is not clear that the current wording of R28 achieves this. SCC will seek to agree revised wording with the Applicant.
1.18.10	The Applicant	Given the involvement of the port of Lowestoft with the construction of offshore wind farms such as Dudgeon, Galloper, Greater Gabbard and East Anglia ONE, and parent company investment there, please c) explain how your current position has informed your assumptions about traffic generation in the study area, both for onshore and offshore construction and operations; and consider whether the assessment you have undertaken is sufficiently flexible and robust to provide the worst case scenario in respect of onshore traffic and transport impacts		With regards to the onshore operational phase, Section 26.6.2 of Chapter 26 (APP-074) outlines the potential operational activities and concludes that given the activities listed no significant traffic impacts are identified.	It is not clear from the applicant response whether they are referring only to the onshore cable corridor and the substation or to the whole project including port activities. Until a port is identified the LHA does not consider that the transport impacts associated with the operational phases of the onshore activities can be fully assessed.
1.18.12		Paragraph 7 states that Annual Average Daily Traffic (AADT) has been used, and the figures given in Table 26.12, from various sources, are AADT. b) In view of its relevance as a measure of 7am to 7pm construction traffic, please explain why you have not used 12-hour figures.		b) Daily traffic flows have been utilised to undertake a proportional screening exercise applying the GEART Rule 1 and 2 thresholds. They are an easily understood metric, accepted by Councils and Highways England and evident in previous DCO applications of a similar nature (e.g. East Anglia Three and Norfolk Vanguard).	To clarify the SCC position, the metric of daily traffic flow is accepted but this comment shall not be taken that the SCC accepts the use of GEART in its entirety (see RR).

1.18.15		Please explain how your HGV strategy will work in practice and address this concern satisfactorily and effectively.		Section 2.2.3 of the Outline Construction Traffic Management Plan (OCTMP) (APP-586) includes details of measures to ensure that HGVs use the agreed routes. In summary measures include: advanced signing, providing drivers with delivery instructions and ensuring the Projects' traffic is distinguishable from other traffic. Section 4 provides details of how this will be monitored and enforced.	SCC is exploring the use of GPS with EDF for the SZC project based on experience at Hinkley Point. The LHA would consider this an appropriate method of monitoring HGV movements including 'distinguishing' SPR traffic and would look to agree this through the CTMP.
1.18.19		Paragraphs 18 and 19 mention temporary alterations to the highway (listed in Table 26.2) and that it is anticipated that these would be completed before construction starts on the relevant section of the cable route. Please a) explain why and under what circumstances construction might start before completion of these alterations; b) state for how long these temporary alterations would be needed; and confirm that there are no other offsite locations which in your view would require highway improvements in connection with this project.		a) The following response considers each of the three highways alterations (listed in Table 26.2 of Chapter 26 of the ES (APP-074)): • Improvements are proposed to the junction of the A12 and A1094 to address road safety impacts identified within Chapter 26 of the ES (APP-074). Construction could commence prior to completion of these works if it could be demonstrated that the Projects' traffic would not lead to significant impacts. This could include, a period where construction traffic flows are forecast as being much lower than the peaks assessed or where traffic would not be required to use the junction. • Localised widening and vegetation clearance is proposed at the junction of the A1094 and B1069. Chapter 26	SCC notes that some work, such as the temporary site accesses are included in the definition of pre-commencement works and can be undertaken before commencement of construction. SCC's positions is: <ul style="list-style-type: none"> • A12/A1094 junction: As this junction has been recorded to have a relatively high number of crashes the LHA considers that even minor increases in construction traffic (including pre-commencement activities) would be unacceptable on safety grounds. • A1094 / B1069 junction. Timing of any clearance or widening works will have to avoid pre commencement and construction works as this is the only agreed route to the main site compound. SCC understood that the

			<p>of the ES (APP-074) outlines that this mitigation is required to facilitate Abnormal Indivisible Load (AIL) movements associated with the delivery of the Projects' transformers. It is therefore reasoned that the mitigation would not be required until such point as the transformers are required in the construction programme. • Potential alterations to the A12 Marlesford Bridge structure. Chapter 26 of the ES (APP-074) outlines that this potential mitigation could be required if AILs associated with the delivery of the Projects' transformers were to pass over this structure. Chapter 26 of the ES (APP-074) outlines two potential ports for the import of the transformers: Lowestoft and Felixstowe. Should the load come from Lowestoft the AILs would not pass over the Marlesford Bridge and therefore no alterations would be required. If the load were to come from Felixstowe, the load would pass over the Marlesford Bridge. Should the Felixstowe option be taken forward, further investigations would be undertaken and the requirement for mitigation agreed with the Councils. If mitigation is required it is reasoned that the works would not be required until such point</p>	<p>vegetation clearance was also a measure to improve visibility and hence road safety.</p> <ul style="list-style-type: none"> • A12 Marlesford Bridge. Again SCC has difficulty envisaging how these works can be undertaken after the start of pre commencement works due to the disruption that temporary traffic management would cause to existing traffic, SZC traffic and SPR traffic. • Minor footway works. These will also need to be programmed to avoid causing delays or disruption to SPR and SZC traffic on these routes. The B1122 will be the main access for all HGVs for SZC.
--	--	--	---	--

				<p>as the transformers are required in the construction programme.</p> <p>b) The offsite highway improvements detailed Table 26.2, Chapter 26 of the ES (APP-074) would be reinstated post construction unless agreed to left in situ by the Councils.</p> <p>With regards to other locations where offsite highway improvements may be required, paragraph 22 of the Chapter 26 of the ES (APP-074) outlines the requirement for a series of localised footway improvements to address potential impacts upon pedestrian amenity.</p> <p>Further details are set out in section 26.6.1.8 of Chapter 26 of the ES</p>	
1.18.20		<p>Table 26.2 states that "Potential structural alternations [sic] " are required to Marlesford Bridge on the A12 to facilitate the movement of AIL vehicles over this bridge. a) What structural alterations do you envisage? b) Do you yet know whether these alterations will be required? c) How will it be possible and what is the business case for these structural alterations to be temporary rather than permanent?And which access routes will be utilised by AIL?</p>		<p>The scope or scale of structural alterations has not been determined at this stage due to AIL route and load variables (see response to Q1.18.19). If the A12 South is identified as the preferred AIL haul route, there are a broad range of interventions available ranging from temporary load bearing solutions to, at the top end of the scale, bridge alterations. Bridge alterations may be more permanent in nature. These will be determined pre-construction and the necessary technical approvals will be acquired from SCC.</p>	<p>The applicant proposes that the traffic impacts of the, as yet, unquantified work on the A12 Marlesford Bridge will be assessed and approved separately to the other construction works. While, due to the uncertainties, this is understandable it does mean that the full impacts of the DCO in its entirety cannot be assessed at this point in time. The LHA would request that the applicant assesses the impacts of the realistic worst-case scenario.</p>
1.18.21		<p>Paragraph 22 mentions localised</p>		<p>Paragraph 22 of the Chapter 26</p>	<p>The part of Requirement 28 relevant</p>

		footway improvements. a) Is it intended that these are also temporary, or will they be permanent? b) If permanent, how are they secured in the DCO?		of the ES (APP-074) outlines the requirement for a series of permanent localised footway improvements to address potential impacts upon pedestrian amenity. Further details are set out in section 26.6.1.8 of Chapter 26 of the ES (APP-074) and section 3.1 the OCTMP (APP-586). This is secured in Requirement 28 of the draft DCO (APP-023) which requires a CTMP to be submitted to and approved by the relevant planning authority in consultation with the relevant highway authority and this must be in accordance with the OCTMP.	to these works must be submitted for approval at a stage to allow completion of construction before significant construction traffic movements from either EA1(N), EA2 or SZC occur to avoid unacceptable disruption to highway users and mitigate relevant impacts.
1.18.24		Table 26.3 Realistic Worst Case Scenarios item 8 refers to the haul road. Please explain how use of ground stabilisation would reduce the length of the haul road and HGV movements.		Alternatives to a haul road such as ground stabilisation, the use of tracked vehicles, or running on the formation would reduce the length of the haul road where imported stone would be required and consequently there would be fewer HGV movements. The length of the haul road itself would not reduce.	While soil stabilisation is an attractive proposition, as it reduces the aggregate required for the haul road, if it is through hydraulic means (lime / cement) the method of remediation should be considered.
1.18.25		Table 26.4 item 7 covers road closures and says that in terms of embedded mitigation advance signing would be implemented to assist drivers in finding alternative routes and that works would be staggered. a) Where is this commitment secured? b) Would you also provide information to satellite navigation companies to assist users in		a) OAMP (APP-587) paragraph 45 states "The detailed design of traffic management at accesses and crossings will be undertaken prior to construction and agreed with SSC in accordance with the requirements set out within the draft DCO". A final Access Management Plan is secured by	The securement of the access management plan (Requirement 16) must be in advance of the construction of the site access (i.e. pre-commencement works).

		determining the best routes for their journeys in real time?		Requirement 16 of the draft DCO (APP-023). b) All street works will be notified to SCC under the provisions of the New Roads and Street Works Act 1991. This will ensure that details of the street works are agreed with SCC and captured on the national street gazetteer and will be available to satellite navigation providers.	
1.18.27		Paragraphs 74 and 75 mention HGV movements on rural roads and the associated collision risk. Have the existing collision records been examined and, if so, a) what mitigation is being considered; and b) how would such mitigation be secured?		Through the ETG process the approach to assessing the potential impacts upon road safety (impact 3) was agreed with the Councils and Highways England. The approach involves detailed consideration of collision clusters and collision rates utilising Police (Stats 19) records to determine user groups (including HGVs) and causation factors. This is detailed within section 26.5.4 of the ES (APP-074). a) Section 26.6.1.10 of the ES (APP-074) details a full assessment of all identified collision clusters and high collision rate routes, and determines the requirement for mitigation. The A12 / A1094 'Friday Street' junction was assessed as being subject to significant adverse impacts and the following mitigation is proposed: <ul style="list-style-type: none"> • A reduction in the posted speed limit in advance of the junction from 50mph to a 40mph; • Provision of enhanced 	As stated in our Relevant Representations, the mitigation proposed in the DCO for the A12/A1094 Friday Street Junction is not considered acceptable by SCC.

				<p>warning signage to better highlight the junction to approaching drivers; • Provision of 'rumble strips' and associated slow markings, to provide an audible and visual warning of the hazard to approaching drivers; and • A commitment in section 2.3.2 of the Outline Traffic Plan (APP-588), to manage employee traffic demand through the junction during peak periods. General road safety 'embedded' mitigation is captured in Section 2.2.6 of the OCTMP (APP-586). b) Friday Street mitigation is secured under Schedule 1 of the draft DCO (APP-023) as Work No.36. General road safety measures are detailed within the OCTMP (APP586) and would therefore be secured under Requirement 28 of the draft DCO (APP-023).</p>	
1.1.28		<p>Paragraph 81 says that AIL may come from either Felixstowe or Lowestoft and that SCC and HE have advised that Lowestoft is preferred in order to avoid the Farnham Bends. We also note that in paragraph 82 you state that "the bend at Farnham is negotiable by the AIL vehicle, with full carriageway occupation and some kerb overrunning ..." Please a) Explain the mitigation measures you propose for Farnham; b) give an update as to which port you intend to select; and c) state whether you have considered using the rail network to transport AIL, for instance to the existing</p>		<p>a) Appendix 26.4 of the ES (APP-530) demonstrates that the AIL can negotiate the route through Farnham. The mitigation measures required to allow the AIL to pass through Farnham are also detailed on drawing number 18.952SPA01 of Appendix 26.4 (APP-530) and include full road occupation, kerb overrunning and the use of steel plates or timber packing for protection. b) The Applicants are not able to provide an update upon which port would be used</p>	<p>SCC does not accept the concept of the over-running of verges or footways to allow passage of AILs through Farnham. The authority has highlighted the tight constraints of the location, as shown on the swept path drawings submitted by the applicant. SCC would expect a detailed method statement for management of AILs through this location specifically with regard to how highway users such as pedestrians and the infrastructure will be protected. The need for this method statement would depend on</p>

		railhead at Leiston (Sizewell Halt); and if not, please explain why not.		as this is subject to availability at the time of construction. For more information on ports see the Applicants' response to question 1.17.4. c) Rail was not considered a viable option as it was considered that the AIL weight (280 tonnes) and gauge (4.4m wide by 4.4m high) could not be accommodated by the rail network.	whether the Sizewell C Two Village Bypass is delivered prior to the need to transport AILs along this route.
1.18.29		Paragraph 83 says that Network Rail has advised that a rail bridge over the A1094 should be avoided. Please a) clarify whether the railway goes over or under the A1094 and b) explain why the bridge should be avoided.		a) The railway goes under the A1094. The bridge is owned and maintained by Network Rail. b) Paragraph 8.1.12 of Appendix 26.3 (APP-529) provides details of conversations with Network Rail and confirms the bridge does not have the structural capacity to accommodate the proposed heavy load.	Have any conversations have been held between the applicant and network rail regarding the potential for improving the rail bridge to carry heavy loads or has this route been discarded for other reasons?
1.18.31		Paragraph 85 outlines your proposals for arranging the timing and routeing of AIL in the event of a transformer needing to be replaced. a) You say "any of the transformers" – do you propose that these proposals apply to the NG substation as well as your substation? b) Is there a safe permanent operational access proposed to the substation for use by you and by others eg NG for the lifetime of the project? If so, would this be used?		a) National Grid has not identified the requirement for any AILs associated with the National Grid substation works. Paragraph 334 of Chapter 26 the ES (APP-074) details that during the operational phase, access to the onshore substation would be via access 13 to the north of Friston (as shown in Figure 26.2 (APP-307). This access would also be available for the National Grid substation.	See comments regarding Traffic and Transport Clarification Note. SCC also notes that while the applicant considers a temporary reduction of speed limit is necessary for temporary use this will not remain for the permanent use of the site access. SCC will be seeking clarification on the comment that National Grid have not identified the requirement for any AIL movements to their sub station. SCC understood that the traffic data provided by SPR covered all movements associated with the construction of all of the sub stations.
1.18.40		In paragraph 213 you state with reference to National Grid employees		Once constructed, access 13 would be available to National	SCC would like SPR to clarify what traffic will be accessing the National

		<p>“These employees would instead access from access 13 ... once this access is available.” Please confirm that access 13 will be available whenever it is needed by National Grid personnel and by any third parties working on behalf of National Grid</p>		<p>Grid personnel and third parties.</p>	<p>Grid Substation from access 13 when this is available (see section 26.3.3 of Chapter 26 of the ES as contained in 1.18.41). Specifically will HGvs accessing the NG substation be permitted or will these be restricted to the haul road as for the EA1(N) and EA2 sub-stations?</p>
<p>1.18.47</p>		<p>In paragraphs 295 and 382 you outline a proposal by EDF Energy to replace the A12/A1094 priority junction with a roundabout junction as part of the mitigation proposals for the Sizewell C New Nuclear Power Station project. Please give an update in respect of any discussions you have had with EDF and the highway authority in respect of this proposal. In particular: a) has this proposal been accepted or agreed in principle with the highway authority? b) has the bringing forward of this proposal been considered, such that it is ready for use as mitigation for this project including cost sharing with EDF, given that you propose two separate projects being constructed simultaneously (Scenario 1) and given SCC concerns in respect of the temporary measures you propose? and c) have intelligent traffic signals been considered as a temporary measure to improve junction performance and reduce gap acceptance collisions?</p>		<p>a) The A12 / A1094 roundabout proposal is part of the overall 'Two Villages Bypass' mitigation scheme proposed for Sizewell C. The Applicants are not in a position to comment on whether the proposed roundabout junction (proposed as part of the mitigation proposals for the Sizewell C New Nuclear Power Station project) is acceptable to the local highway authority. b) The Sizewell C roundabout solution is a major 'off-line' intervention, requiring land acquisition, procurement, planned roadworks and a long construction duration. There is a high risk that this mitigation could not be delivered under the SZC DCO for the Projects' construction start date and the Applicants cannot restrict or constrain the delivery of the Projects by being dependant on the delivery of a roundabout solution by the Sizewell C project which is not yet consented and has not yet secured its necessary financing. Notwithstanding this, the</p>	<p>SCC can confirm that in highway terms the roundabout proposed by EDF for the A12/A1094 junction is acceptable in principle. The LHA is not aware of any communication between the two projects on this matter but would support such liaison. SCC has had correspondence with the applicant regarding traffic signals as an appropriate mitigation measure and would accept these in principal if Sizewell C has not delivered the roundabout before EA1(N) or EA2 commence or is not in the process of delivering the roundabout.</p>

				<p>Applicants do not consider a proposed roundabout at this junction to be a necessary or appropriate form of mitigation for the Projects given the minor adverse residual impact on road safety assessed for the Projects at this junction. Furthermore, the design of the proposed roundabout for the Sizewell C project is integrated with a two-village by-pass also proposed as mitigation for the Sizewell C project. c) Whilst the Applicants consider the mitigation measures proposed within the Applications are acceptable at this junction, discussions with the local highway authority are ongoing regarding the merits of installing temporary traffic signals at this junction.</p>	
1.18.48		<p>You state in paragraph 306 that traffic speeds would be reduced at the A12/A1094 junction following implementation of your package of mitigation measures. Would the new 40mph limit be implemented and monitored prior to the start of construction to ensure that this is the case?</p>		<p>There is an existing safety camera provided on the A12 just (~180m) to the north of the junction of the A1094. Data captured from this camera would be sourced from the Police to give an indication of compliance with the change in speed limit following the implementation of the 40mph limit.</p>	<p>SCC notes that the mechanism to reduce the speed limit from 50mph to 40mph, as proposed by the applicant, has not been established, nor has any costs associated with modification of the road signs or recalibration of the speed camera.</p>
1.18.51		<p>Paragraph 330 refers to the use of a pilot vehicle for larger articulated vehicles heading for accesses 5 and 6. Please explain how the use of a pilot vehicle would reduce driver delay at the A1094/B1122 roundabout junction such that it can be relied upon as mitigation.</p>		<p>The swept path analysis presented within Appendix 26.21 (APP—547) demonstrates that an articulated HGV would oversail into the opposite lane when turning from the A1094 onto the B1122. If this lane was</p>	<p>SCC understands that the driver of any pilot vehicle will require the appropriate legal powers to stop vehicles. This should be confirmed with Suffolk Constabulary.</p>

				<p>blocked by an oncoming vehicle the HGV would not be able to make the manoeuvre. The HGV or oncoming driver, may therefore have to reverse which may not be possible with following traffic, leading to driver delay. A pilot vehicle would run ahead of the vehicle it is escorting. At the junction of the A1094 and B1122, the pilot vehicle would stop any oncoming traffic to allow the following HGV to pass any oncoming traffic.</p>	
1.18.68		<p>Paragraph 21 says that “Contact details for the TPCos and TCo will be submitted to relevant stakeholders ...prior to the commencement of construction.” a) Who are the relevant stakeholders? b) Has the inclusion of contact details on a website as well as flyers and posters been considered, to enable easier contact and reporting?</p>		<p>a) It is anticipated that as a minimum, relevant stakeholders would include the Councils, Parish Councils that may be affected, and Highways England. b) Section 2.5 of the Outline Code of Construction Practice (COCP) (APP- 578) sets out the processes for developing a Stakeholder Communications Plan which includes the commitment to proactive public relations using a combination of communication channels. The final Travel Plan would adopt the communication measures developed in the Communication Plan as a means of communicating traffic and transport effects.</p>	<p>SCC would also expect stakeholders to be informed of any changes to the TPCos and TCo. The LHA would recommend a specific website is used for reporting and liaising on the project.</p>
1.19.75		<p>Paragraphs 50-52 deal briefly with abnormal loads, and paragraph 50 says that AIL movements will be outside the restrictions in the OCTMP and subject to</p>		<p>a) Paragraph 80 of Chapter 26 of the ES (APP-074) details a total of two AIL transformer deliveries per project (a total of</p>	<p>The total of 4 special order AIL movements appears to not include those associated with the national grid substation. See also the</p>

		<p>separate agreement with the relevant highway authorities and the police. a) How many AIL movements are envisaged during construction and operation of the project? b) How have the impacts been assessed? c) Will those affected be consulted and/or notified and if so how? d) What offsite highways works will be required? And e) are they those described in section 3.1 for HGV traffic?</p>	<p>four deliveries simultaneously). There is also potential for a number of smaller AILs (e.g. plant movement and cable drums). This are set out in a clarification note (ExA.AS-8.D1.V1) submitted to the Examination at Deadline 1. b) The transformer AILs are designated 'Special Order Vehicles' 1 and therefore will be subject to a separate assessment and consenting process as directed by the Department for Transport. The smaller AILs will typically be carried on standard vehicles and are included in the HGV figures assessed in the Chapter 26 of the ES (APP- 074) c) Section 2.5 of the Outline CoCP (APP-578) sets out the processes for developing a Stakeholder Communications Plan which includes the commitment to proactive public relations using a combination of communication channels. d) Table 26.2 of Chapter 26 of the ES (APP-074) details the off-site highway works required to accommodate the Projects' traffic demand.) Section 3.1 of the OCTMP sets out further offsite highway works required to mitigate amenity impacts.</p>	<p>response to the traffic and transport clarification note.</p>
1.18.76		<p>Section 4.2 refers to a monthly monitoring report produced by the TCo and CTMPCos, but does not explain</p>	<p>The purpose of the monitoring report (as outlined in paragraph 72 of the OCTMP (APP-586)) is</p>	<p>SCC would expect the monthly monitoring report be submitted to SCC and LPA and not to request it.</p>

		<p>what the objective of the report is or who is able to view it. Please explain this process further</p>		<p>to identify effective / ineffective measures and the requirement for any remedial action to achieve the agreed targets. It is intended that in compiling the reports the Contractor will be able to see whether they are complying with their targets and actions, whether there are any emerging issues and ensure that any emerging issues can be rectified early through amendments to the plan. The Councils will be able to request a copy of this monthly monitoring report.</p>	<p>SCC has a preference for this information to be placed in the public domain for transparency. It would also be requestable from either authority received a FOI request.</p>
1.18.77		<p>Section 4 sets out your proposals for monitoring and enforcement. Will the highway authority have access to the HGV data to monitor traffic movements, or will this information only be provided when a breach is reported? Please explain the process further</p>		<p>Section 4.2 of the OCTMP (APP-586) outlines that a monthly monitoring report will be produced. The monitoring report will include details such as the results of surveys and monitoring. The Councils will be able to request a copy of this monthly monitoring report.</p>	<p>See response to 1.18.76</p>

6. Comments on any additional information/submissions received by Deadline 1

Traffic and Transport Clarification Note

Section 3. Application of the GEART

With regards to the clarification on the use of GEART submitted by the applicant in the clarification note, the highway authority note the following:

- That the link sensitivity applied generally reflects the locations being assessed.
- Concerns remain that a 20% increase in HGVs is classified as a negligible impact without further understanding of how these conclusions are reached. Further understanding is sought on how conclusions along the high sensitivity locations along the A12 corridor are reached based on these impacts.
- Concerns remain about the general approach for using GEART and how impacts are determined based on thresholds of 30%; however, aside from the previous bullet point and following the submission of the technical note and given the calculated impacts it is recognised that this is unlikely to affect the majority of conclusions in the assessment (not including any conclusions reached on the cumulative assessment as this information is yet to be submitted).
- Concerns remain about the general approach of identifying a less than doubling of HGV traffic as a minor or negligible impact, but a greater than doubling as moderate or major. However, following the submission of the technical note it is recognised that this is unlikely to affect the conclusions of the assessment (not including any conclusions reached on the cumulative assessment as this information is yet to be submitted).
- Further understanding of the cumulative impacts is needed before the risk of any impact potentially increasing between thresholds due to a small change in traffic flow can be fully understood.
- We remain concerned that the method of assessment does not fully appreciate different real-life users' perceptions of traffic impacts.

Section 4. Impact of a later construction start date.

While SCC accept that the proportion of SPR traffic will reduce in proportion to the increasing background traffic this does not alter the authorities concerns

- Of a later construction start date with higher baseline traffic or changes in traffic behaviour resulting in the additional EA1(N) and / or EA2 construction traffic causing an exceedance in theoretical capacity (as noted in para 29)
- A road safety issue arising on the network which is in turn exacerbated by construction traffic

- of the impacts of the peak for SZC traffic coinciding with peak SPR traffic i.e. the cumulative impact of the projects.

Para 5.1.1

No evidence has been provided by the applicant to demonstrate why the A12 Farnham Bridge is considered to have a potential need for strengthening.

Para 5.1.2

The clarification note reaffirms that SPR are not proposing any measures to improve the highway to provide a permanent extension to HR100. Following discussions with Highways England (para 45) that did not involve the Local Highway Authority SPR state that a formal AIL route to the site would not be supported by Highways England.

From the evidence supplied to the ExA it is explicit that the Friston site will not just contain the SPR and National Grid substations, but others that follow in the planning process. Therefore, access for HGVs and AILs up to and including high and heavy loads will be required in the future. At best this will require repeated interventions and disruption for piecemeal improvements and at worse a cluster of substations served by highway network inadequate for such traffic.

In para 47 the applicant states that there is no requirement for AIL movement during the operational phase. Firstly, the LHA assumes this refers to Special Order (high and heavy) AILs and not Cat1 1 to 3. Secondly the LHA would seek evidence from projects that are in the operation phase to confirm special order movements have not been required during the lifetime of the project.

If the B1069 – A1094 – B1121 route is by default made the main access to the substation cluster, the highway authority would look for improvements at the A1094 / B1069 and A1094 / B1121 junctions to allow safe movements of large loads and other HGVs accessing the site. It is noted that the applicant has not explored the potential for strengthening the A1094 rail bridge at Farnham as an alternative route for high and heavy routes than through Leiston and Knodishall.

Circular 61/72 allows for LHA to request funding to modify existing routes from DfT but not to create them. The document places a responsibility on the LHA to not compromise these routes. Regardless of whether the route via Leiston becomes an approved route its use as the access to the substation site will **fetter the highway** authority's ability to improve the network. While no improvements are currently planned the authority is considering the impact of new government guidance (LTN 1/20) and its impact on provision for cyclists and pedestrians. This may result in widening of narrow footways or pedestrian / cycle crossings to achieve appropriate measures, particularly through Leiston (eg Haylings Road).

Other AILs (non-high and heavy).

The information supplied by the applicant in the appendixes is detailed and well presented. It is not the movement of individual AILs or even the cumulative total that is of concern in terms of road capacity but the specific issue of:

- the delays resulting from such slow moving vehicles on the local network, and;
- the suitability of the highway for the size of load.

Unfortunately, delay caused by AILs is not a factor that can be modelled using standard methods, although a typical maximum speed of 30mph (Cat 2 or 3) or 20mph (special order movements) would require a load to be travelling for at around two hours in each direction. Movements of 1 to 3 per day for SPR should be considered with an average of 4 for SZC utilising many of the same roads. Some laybys are present on the A12 to allow large loads to pull off the main carriageway, but no suitable laybys are present on other roads such as the A1094, B1122, and B1069. Large loads will be unable to pull off to allow other vehicles to pass with the consequential risk of delays or diversion of traffic onto other, less suitable routes.

Air Quality Clarification Note

Para 56

The applicant will be required to enter a s278 agreement to undertake the mitigation works on the A12/A1094 junction and a commitment to assess air quality impacts of diverted traffic would be an acceptable proposal although the LHA does note that this will result in it being assessed separately to the other facets of the project and hence cumulative impacts harder to assess as part of the DCO examination.

Outline Sizewell Gap Construction Method Statement

Para 12

Gates should be positioned to allow vehicles to safely exit the highway when they are closed.

Para 27

If required drainage should be provided to prevent water flowing onto the public highway.

Onshore Crossing Schedule

Notwithstanding the applicant's comments on the management of traffic during trenching across highways SCC notes that trenchless methods are less disruptive to the fabric of the highway and consider this method should be used unless satisfactory reason provided not to. It does recognise that the presence of buried apparatus may in some circumstances make directional drill impractical.

7. Comments on Post hearing submissions

Not applicable.

8. Responses to any further information requested by the ExA for this deadline

Not applicable.