



# East Anglia TWO Offshore Windfarm

## Appendix 26.1 Traffic and Transport Consultation Responses

### Environmental Statement Volume 3

Applicant: East Anglia TWO Limited  
Document Reference: 6.3.26.1  
SPR Reference: EA2-DWF-ENV-REP-IBR-000918\_001 Rev 01  
Pursuant to APFP Regulation: 5(2)(a)

Author: Royal HaskoningDHV  
Date: October 2019  
Revision: Version 1

#### Revision Summary

Rev	Date	Prepared by	Checked by	Approved by
01	08/10/2019	Paolo Pizzolla	Julia Bolton	Helen Walker

#### Description of Revisions

Rev	Page	Section	Description
01	N/A	N/A	Final for Submission

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**Appendix 26.1** is supported by the tables listed below.

Table Number	Title
<b>Table A26.1</b>	Traffic and Transport Consultation Responses

## Glossary of Acronyms

AILs	Abnormal Indivisible Loads
CIA	Cumulative Impact Assessment
DCO	Development Consent Order
DMRB	Design Manual for Roads and Bridges
ES	Environmental Statement
ETG	Expert Topic Group
GEART	Guidelines for the Environmental Assessment of Road Traffic
HGV	Heavy Goods Vehicle
LCV	Light Commercial Vehicle
NCC	Norfolk County Council
OAMP	Outline Access Management Plan
OCTMP	Outline Construction Traffic Management Plan
OTP	Outline Travel Plan
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SCC	Suffolk County Council

## Glossary of Terminology

AADT	Depart for Transport recognised measurement of annual average daily traffic flows.
Applicant	East Anglia TWO Limited.
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Construction consolidation sites	Compounds associated with the onshore works which may include elements such as hard standings, lay down and storage areas for construction materials and equipment, areas for vehicular parking, welfare facilities, wheel washing facilities, workshop facilities and temporary fencing or other means of enclosure.
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
HDD temporary working area	Temporary compounds which will contain laydown, storage and work areas for HDD drilling works.
HGV	A term for any vehicle with a Gross Weight over 3.5 tonnes. This assessment also uses the term HGV as a proxy for HGVs and buses / coaches recognising the similar size and environmental characteristics of the respective vehicle types.
Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.

Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO project from landfall to the connection to the national electricity grid.
Onshore preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.

Onshore substation	The East Anglia TWO substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO project.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.
Two-way movement	A movement is the process of transporting goods from a source location to a predefined destination. A two-way movement represents the inbound (laden trip from source) and the outbound unladen trip (back to source). For example, 20 two-way movements comprise 10 laden trips from source and 10 outbound unladen trips back to source.



# 26.1 Traffic and Transport Consultation Responses

## 26.1.1 Introduction

1. This appendix to **Chapter 26 Traffic and Transport** covers those statutory consultation responses that have been received as a response to the Scoping Report (2017), the Preliminary Environmental Information Report (PEIR) (2018) and Expert Topic Group (ETG) Meetings.
2. Responses from stakeholders and regard given by the Applicant have been captured in **Table A26.1**.
3. As Section 42 consultation for the proposed East Anglia TWO project was conducted in parallel with the proposed East Anglia ONE North project, where appropriate, stakeholder comments which were specific to East Anglia ONE North, but may be of relevance East Anglia TWO, have also been included in the consultation responses for East Anglia TWO.

**Table A26.1 Consultation Responses Related to Chapter 26 Traffic and Transport**

Consultee	Date/ Document	Comment	Response / where addressed in the ES
<b>The following comments were received prior to consultation on the PEIR and were in response to the Scoping Report or direct consultation with stakeholders. These comments were taken into account in the production of the PEIR</b>			
Suffolk County Council and Suffolk Coastal District Council	08/12/2017 Scoping Response	The onshore study area shown in the Scoping Report does not include the necessary parts of the highway network that will need assessed. For example, as a minimum we would expect to see the transport impact modelled as far westward as and including the A12. Information is limited regarding the length of any ducting or location of onshore structures. This creates uncertainty in estimating the impact of construction traffic on the highway.	The extent of the onshore highway study area has been revised to include all necessary parts of the highway network that will need to be assessed and agreed with Suffolk County Council (SCC) through the ETG process.  The detailed derivation of traffic demand including all assumptions is provided within <b>section 26.6.1</b> of this chapter.
Suffolk County Council and Suffolk Coastal District Council	08/12/2017 Scoping Response	Abnormal Indivisible Load (AIL) delivery will need to be on agreed construction routes and timed to minimise disruption given the rural nature of the area around Sizewell.	An Abnormal Indivisible Load (AIL) study has been undertaken by Wynns Ltd. to inform the management measures required to deliver AILs. A summary of the findings of the AIL study are provided within <b>section 26.4.3.1.5</b> of this chapter, whilst the full study is provided as <b>Appendix 26.3</b> .
Suffolk County Council and Suffolk Coastal District Council	08/12/2017 Scoping Response	Cumulative and in-combination impacts will be required to be assessed and if necessary mitigated or compensated. Assessing the onshore study area only is inadequate.	<b>Section 26.7</b> of this chapter provides an assessment of the cumulative impacts.  The extent of the onshore highway study area has been revised to include all necessary parts of the highway network that will need to be assessed and agreed with SCC through the ETG consultation process.
Leiston-cum-Sizewell Town Council	21/12/2017 Scoping Response	The access to any potential site and how the access road will be fenced off should be addressed and a very	Preliminary access concepts are provided within <b>Appendix 26.18</b> .

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		clear indication of what rights of way or right to roam inhibitions will have to be put in place to achieve this.	Potential impacts upon Public Rights of Way (PRoW) are considered within <b>Chapter 30 Tourism Recreation and Socio Economics</b> . These are detailed further with the Outline Public Rights of Way Strategy (OPRoWS), secured under a requirement of the draft DCO, and submitted with this DCO application.
Norfolk County Council	01/11/2017 Scoping Response	Define the nature of the traffic likely to be generated. In addition, for the largest vehicles proposed to use each access route(s) this must include minimum width (including unhindered horizontal space), vertical clearance and axle weight restriction.	Norfolk County Council (NCC) have raised numerous issues in their Scoping response. The NCC administration area is not included in the onshore highway study area and would not be directly impacted by the proposed East Anglia TWO project. Notwithstanding, the issues raised by NCC are valid in terms of the approach to the Traffic and Transport assessment and are therefore addressed to inform wider stakeholders.  <b>Section 26.6.1</b> of this chapter provides a summary of the likely traffic demand.  The AIL study provided in <b>Appendix 26.3</b> details the dimensions of the largest vehicles proposed.
Norfolk County Council	01/11/2017 Scoping Response	Assessment of the access route should include a site inspection and details of contact with the appropriate Highway Authority (including the Highways Agency [now Highways England] for Trunk Roads where applicable). In addition: [numbered for ease of reference]  1. Details of any staff/traffic movements/access routes;	<ol style="list-style-type: none"> <li>1. A summary of the forecast HGV and employee vehicle movements is provided within <b>section 26.6.1</b> of this chapter.</li> <li>2. Preliminary access concepts including 'sightline provision' are provided in <b>Appendix 26.18</b>.</li> </ol>

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		<ol style="list-style-type: none"> <li>2. Detailed plans of site access/e.g. incorporating sightline provision;</li> <li>3. Confirmation of any weight restrictions applicable on the route together with details of contact with the relevant Bridge Engineer;</li> <li>4. Overhead/ underground equipment – details of liaison with statutory undertakers - listing statutory undertakers consulted together with a copy of their responses; and</li> <li>5. Details of any road signs or other street furniture along each route that may need to be temporarily removed/relocated.</li> </ol>	<ol style="list-style-type: none"> <li>3. No weight limits exist within the onshore highway study area.</li> <li>4. All statutory undertakers have been formally consulted though the Section 42 process.</li> <li>5. The AIL study (provided in <b>Appendix 26.3</b>) provides details of the street furniture that would need to be temporarily removed / relocated.</li> </ol>
Norfolk County Council	01/11/2017 Scoping Response	<p>The following details of construction must be made clear: [numbered for ease of reference]</p> <ol style="list-style-type: none"> <li>1. Timing of construction works;</li> <li>2. Removal of parked vehicles along the route(s) – including whether or not alternative parking arrangements are being offered or bus services provided;</li> <li>3. Removal and reinstatement of hedgerows – since these are usually in private ownership has contact been made with the owners;</li> <li>4. Identification of the highway boundary along the construction traffic route together with verification from the Highway Authority;</li> <li>5. Confirmation of whether the identified route involves the acquisition of third party land and if so has consent been given;</li> <li>6. Confirmation of any required third party easements – e.g. will construction vehicles need to overhang ditches (these are usually in private ownership),</li> </ol>	<ol style="list-style-type: none"> <li>1. Details regarding the potential timing of the construction works are provided in <b>Chapter 6 Project Description</b>.</li> <li>2. <b>Appendix 26.3</b> provides details of where temporary parking suspension would be required to accommodate the movement of AILs.</li> <li>3 - 7. All works would be within land controlled by the Applicant (or with the agreement of the landowner) or within the highway boundary.</li> <li>8. <b>Figure 26.1</b> provides a graphical plot of sensitive receptors within the onshore highway study area.</li> <li>9 - 11. <b>Chapter 22 Onshore Ecology</b> considers the impacts of the proposed East Anglia TWO project on trees, verges, etc.</li> </ol>

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		<p>private hedges or open land adjacent to the highway;</p> <p>7. Any modifications required to the alignment of the carriageway or verges/over-runs;</p> <p>8. Identification of sensitive features along route;</p> <p>9. Trimming of overhead trees;</p> <p>10. Confirmation of whether any affected trees are covered by a tree preservation order;</p> <p>11. Confirmation of whether any of the verges along the route(s) are classified as SSSI or roadside Nature Reserve status; and</p> <p>12. Confirmation of any extraordinary maintenance agreement/s required by the Highway Authority.</p>	<p>12. The requirements and scope of extraordinary maintenance will be discussed with SCC as part of the development of the Outline CTMP (OCTMP). The OCTMP, secured under the requirements of the draft DCO, has been submitted with this DCO application.</p>
Norfolk County Council	01/11/2017 Scoping Response	A description of the route/s, and plans at an appropriate scale, must be provided for the cabling route/grid connection.	A description of the onshore highway study area and supporting figures are provided within <b>section 26.5</b> of this chapter.
Norfolk County Council	01/11/2017 Scoping Response	Details of type and frequency of vehicle to be used to service the facility/structure(s) when in operation must be provided.	<b>Section 26.6.2</b> of this chapter provides a summary of the likely operational requirements.
Norfolk County Council	01/11/2017 Scoping Response	Details of any long-term highway impact e.g. will trees and hedgerows need additional trimming to allow access for service vehicles during operation must be provided.	
Norfolk County Council	01/11/2017 Scoping Response	The position of structures relative to public highways and/or public rights of way – the minimum distance of which should be no less than 50m – must be provided.	Further details regarding the position of structures is provided within <b>Chapter 6 Project Description</b> .

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Norfolk County Council	01/11/2017 Scoping Response	The applicant must provide define the expected life span of the facility/structures and provide details of decommissioning works including an assessment of whether or not the structure is to be scrapped - i.e. can it be broken up on site and removed or will it require the same logistical process as initial construction.	<b>Section 26.6.3</b> of this chapter provides a summary of the likely decommissioning impacts.
Royal Mail	01/11/2017 Scoping Response	The PEI should include information on the needs of major road users (such as Royal Mail) and acknowledge the requirement to ensure that major road users are not disrupted through full advance consultation by the applicant at the appropriate time in the DCO and development processes.	<b>Section 26.6.1</b> of this chapter provides an assessment of likely increases in traffic during construction of the proposed East Anglia TWO project.
Royal Mail	01/11/2017 Scoping Response	The PEI and subsequent DCO application should include detailed information on the construction traffic mitigation measures that are proposed to be implemented by Scottish Power Renewables / its contractor, including a draft Construction Traffic Management Plan (CTMP).	<b>Section 26.10</b> of this chapter provides a summary of the proposed impacts and mitigation measures. An Outline CTMP (OCTMP). The OCTMP, secured under the requirements of the draft DCO, has been submitted with this DCO application.
Royal Mail	01/11/2017 Scoping Response	Royal Mail is fully pre-consulted by Scottish Power Renewables / its contractor on any proposed road closures / diversions/ alternative access arrangements, hours of working and the content of the CTMP. The PEI should acknowledge the need for this consultation with Royal Mail and other relevant major road users.	Detail of proposed road works, closures and diversions are included within the Outline Access Management Plan (OAMP) (Document Reference: 8.10). The OAMP, secured under the requirements of the draft, has been submitted with this DCO application.
The Planning Inspectorate	20/12/2017 Scoping Response	Baseline data in the Scoping Report is listed as being collated for roads within the onshore study area. The Applicant should consider, as part of the assessment, whether potential impacts to the road network outside of the onshore study area are likely.	The extent of the onshore highway study area has been agreed with SCC and Highway England through the ETG consultation process during the preparation of the ES.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
The Planning Inspectorate	20/12/2017 Scoping Response	The Scoping Report commits to developing the baseline to ensure a DfT-compliant Transport Assessment is undertaken. The Scoping Report does not explain what is meant by this and which DfT guidance will be followed specifically, therefore it does not provide clarity on the baseline studies to be undertaken. The assessment in the PEI should be undertaken against a robustly defined baseline consistent with relevant guidance.	<b>Section 26.5</b> of this chapter provides details of how the baseline highway conditions have been established.
The Planning Inspectorate	20/12/2017 Scoping Response	The PEI should clearly set out the predicted number of people/vehicles and regularity of maintenance visits to ensure that associated impacts are appropriately identified and assessed. Any assumptions used to inform this assessment should be explained within the PEI.	<b>Section 26.6.1</b> and <b>26.6.2</b> of this chapter provide details of the projected numbers of vehicle movements for the construction and operational phases respectively.
The Planning Inspectorate	20/12/2017 Scoping Response	The Scoping Report sets out that 'proposed developments with the potential to generate significant traffic' will be included in the cumulative impact assessment. The Inspectorate draws the Applicant's attention to Planning Inspectorate Advice Note 17 and would expect the cumulative impact assessment to include all relevant developments, whether the individual development concludes significant effects alone or not. This should be clarified in the PEI.	<b>Section 26.7</b> of this chapter provides an assessment of the cumulative impacts.
The Planning Inspectorate	20/12/2017 Scoping Response	The Scoping Report refers to Transport Assessments and Traffic Impact Assessments. The PEI should set out in the methodology the types of assessments being undertaken and the titles attributed to these assessments should be consistently applied throughout the PEI.	<b>Section 26.4</b> of this chapter details the scope of assessment being undertaken.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Suffolk County Council	8 May 2018 Highways Modelling Meeting	Discussion regarding the suitability of using the SCC transport network model. SCC provided detail on coverage, available time periods, etc.	It has been agreed with SCC that a simple (fixed assignment) spreadsheet model would be appropriate to inform the assessment within the ES.
		SCC committed to providing a method statement for deriving future year traffic forecasts. Following a meeting on the 18 July 2018, WSP (as consultants) to SCC provided factors for deriving future year flows.	<b>Appendix 26.10</b> provides a summary of the factors provided by SCC and used to derive future year flows.
		SCC advised that the initial study area should be extended to encompass the A12 and 'four villages'.	The onshore highway study area was extended and subsequently agreed with SCC at the 18 July 2018 Traffic and Transport ETG meeting.  Following the submission of the PEIR, SCC requested a further extension to the onshore highway study area, the extent of this extension was agreed at the 13 May 2019 Traffic and Transport ETG meeting.  The extent of the final agreed onshore highway study area is highlighted within <b>Figure 26.1</b> .
		SCC advised that they held a number of traffic counts for the study area that could be provided but also recommended that SPR undertook independent counts for validation purposes.	<b>Section 26.5.2</b> of this chapter provides details of background traffic counts undertaken by the Applicant and those provided by SCC. Agreement was reached with SCC at the 18 September 2018 Traffic and Transport ETG meeting that the counts undertaken by the Applicant can be utilised.
Suffolk County Council	18 July 2018	SCC confirmed that a neutral period (i.e. no seasonality) could be adopted for the assessment.	Background traffic flows presented within this ES represent 'annual averages' and therefore do not include for seasonality.



Consultee	Date/ Document	Comment	Response / where addressed in the ES
	Traffic and Transport Meeting	SCC advised that all access proposals should be supported by swept path analysis.	Swept path analysis for each access is provided within <b>Appendix 26.18</b> .
		The principle of using a pilot vehicle to escort HGVs along the B1353 rather than extensive road widening was discussed. SCC expressed a wish to see further detail regarding how this would operate and the associated delays.	Following consultation feedback the proposed access from the B1353 has been removed by the Applicant.
		Options for how construction vehicles would access either side of the B1353 were presented, (including direct access from the B1353 or access from Sizewell Gap with vehicles crossing the B1353). SCC stated a preference for a signal controlled crossing at the B1353, with HGVs accessing from Sizewell Gap.	<b>Appendix 26.18</b> provides details of the proposed traffic management proposals for vehicles crossing the B1353.
		SCC advised that where open trenching of the road would be required they would wish to understand the potential impacts of either a full closure or single lane closure.	Following consultation feedback the Applicant have committed to not closing any roads.
		SCC advised that they wish to see copies of the speed surveys before agreeing visibility splays at the Grove Road accesses.	Copies of the speed surveys are provided at <b>Appendix 26.7</b> .
		Options for how construction vehicles would access the onshore substation site were presented.	The traffic distribution presented assumes that all HGVs access the onshore substation site during construction from the B1069.
		SCC advised that they wished to see swept path analysis undertaken for the junction of the A1094 / B1069 and A1094 / B1122.	<b>Section 26.6.1.12</b> of this chapter includes a summary of the results of this swept path analysis.
		The distribution of HGVs to the wider highway network (A12) was discussed. SCC advised that they wish to	<b>Section 26.6.1.3</b> of this chapter identifies that the final distribution of HGV traffic cannot be determined at the time of DCO

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		see a maximum and minimum that could come from the A12 north and south.	submission. Therefore, a sensitivity test has been adopted whereby 100% of HGV traffic is assessed heading north and 100% heading south as a worst case scenario.
		SCC advised that a Stage 1 Road Safety Audit would be required for all accesses.	Stage 1 Road Safety Audits are included within the OAMP, secured under the requirements of the draft DCO, which has been submitted with this DCO application.
		SCC identified those junctions that they considered to be sensitive to increases in traffic and that could require further assessment.  It was agreed that the assessment should focus on delays during the evening pm peak hour.	<b>Section 26.6.1.11</b> of this chapter provides a detailed modelling of each of the sensitive junctions.
		An approach to assessing collisions within the study area was presented. SCC confirmed that they agreed with the approach but would also like to see a review of collision clusters.	<b>Section 26.5.4</b> of this chapter provides a summary of the baseline road safety conditions whilst <b>section 26.6.1.10</b> of this chapter provides a review of the potential impacts.
Suffolk County Council and Highways England	18 September 2018 Expert Topic Group Meeting	Highways England advised that they wished to see the forecast traffic flows through the junctions of the A12 and A14 (junctions 55 and 58).	<b>Section 26.6.1.11</b> of this chapter provides a summary of the forecast traffic demand through junctions 55 and 58.
		The proposed approach for deriving construction traffic flows was shared. This included the consideration of using the worst case demand for all sections, but with a reduction for the A12.  SCC and Highways England confirmed that they agreed with the principle of the approach but would wish to see the full traffic demand data.	<b>Section 26.6.1</b> of this chapter provides detail of the derivation of the construction traffic demand.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		General discussion regarding the suitability of adopting a 1.5 employee to vehicle ratio. SPR confirmed that 1.5 represented a worst case and would be utilised for screening purposes. It was advised that a higher ratio may be adopted for mitigating of impacts.	<b>Section 26.6.1.4</b> of this chapter sets out proposed approach to applying an employee to vehicle ratio.
<b>The following comments were made in response to the PEIR and were taken into account in the production of this ES</b>			
Suffolk Preservation Society	27.03.2019 Section 42 Consultation Response	SPS objects to the lack of analysis of the cumulative landscape and heritage impacts of EA1(N) with EA2, National Grid substation and Sizewell C. Clarification is required on the impacts on the special qualities of the AONB and its setting, including the cumulative HGV and other vehicular movements during the construction phase of the offshore and onshore infrastructure.	More detailed information is available than at the time of the PEIR, therefore <b>section 26.7.2</b> of this chapter now includes a detailed assessment of the potential for cumulative impacts with Sizewell C New Nuclear Power Station.
Public Health England	26.03.2019 Section 42 Consultation Response	The assessment of cumulative impact should be reviewed using the latest PEIR from Sizewell C. Particular attention should be given to traffic and transport impact, with particular regard to impacts on driver delay / stress and impacts on the safety and amenity of non-motorised users (NMU) and potential impacts of increased vehicle movements on air quality. The applicant should consider the nearby development of Sizewell C, assess the cumulative implications on the project and ensure assessments and mitigation measures are consistent and interoperable.	<b>Section 26.7.2</b> of this chapter includes a detailed assessment of the potential for cumulative impacts with Sizewell C New Nuclear Power Station.  <b>Chapter 19 Air Quality</b> contains an assessment of Air Quality with respect to the increase in traffic movements
Public Health England	26.03.2019 Section 42 Consultation Response	The PEIR identifies how non-motorised user (NMU) will be impacted through the loss or change in formal Public Rights of Way (PRoW), open space and the existing road network. Active travel forms an important part in helping to promote healthy weight environments and as such it is important that any	<b>Section 26.5.3</b> of this chapter provides a detailed review of the sensitivity of each of the highway links within the onshore highway study area in the context of all user groups and modes of travel.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		changes have a positive long term impact where possible. Changes to NMU routes have the potential to impact on usage, create displacement to other routes and potentially lead to increased road traffic collisions. The PEIR does not provide any data for NMU within the traffic assessments. Without such data it is unclear how the impact on NMU (pedestrians and cyclists) from the presence of large numbers of HGVs can be assessed. Similarly no data has been presented on the usage of each PRoW affected by the scheme, nor does it identify the specific impact and mitigation to be put in place for each PRoW, for example through diversions. Diverted routes must be designed, installed and maintained to allow for access to the community. A scheme of this scale and nature can also provide mitigation opportunities to enhance the existing infrastructure that supports active travel, physical activity and access to green/blue space. We expect the proposal to contribute to improved provision of infrastructure that supports this type of activity.	<p>Potential impacts upon PRoW are considered within <b>Chapter 30 Tourism Recreation and Socio Economics</b>. These are detailed further with the OPROWS, secured under the requirements of the draft DCO, and submitted with this DCO application.</p> <p>An Outline Construction Traffic Management Plan (OCTMP), secured under the requirements of the draft DCO, has been submitted with this DCO application. This sets out the principles for temporary traffic management for all user types.</p>
Public Health England	26.03.2019 Section 42 Consultation Response	The traffic assessment should include data on non-motorised users. The overall risk to NMU and impact on active travel should be considered on a case by case basis, taking into account, the number and type of users and the effect that the temporary traffic management system or increased vehicle activity will have on their journey and safety. Any traffic counts and assessment should also, as far as reasonably practicable, identify informal routes used by NMU or potential routes used due to displacement. The ES should identify the temporary traffic management system design principles or standards that will be maintained with specific reference to NMU. This may be incorporated within the Code of Construction Practice	

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Waveney District Council	26.03.2019 Section 42 Consultation Response	The highways modelling assessments and assumptions utilised to date along with highway mitigation proposed and how this will be implemented and secured is of interest and concern to Waveney, we encourage use of Lowestoft Port to facilitate construction and maintenance but need to ensure that the highway network from Lowestoft south to the onshore elements of the site is not adversely impacted by the proposals and/or appropriately mitigated. It is noted that so far a worst-case scenario has been assessed with 100% of HGV traffic travelling from the north or from the south. From the north is clearly of concern to Waveney District Council and further detail and assessment of this is required and potential mitigation proposals needed to ameliorate problems in the highway network. In particular we need to see more detail on potential impact of traffic resulting from the project on junctions of the A12 between Lowestoft and Saxmundham.	It has been agreed with SCC as the local highway authority that an assessment of junction capacity north of Yoxford would not be required unless HGVs were to turn off the A12 at either the junction with the A144 or A145. The OCTMP, submitted with this DCO application, details that HGVs would not turn off the A12 at these locations and therefore no further assessment of impacts is presented.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	We seek further information regarding Highways modelling assessments and assumptions utilised, highways mitigation proposed and how this would be implemented and secured.	The Applicant has engaged with SCC regarding this comment and <b>section 26.6.1.11</b> of this chapter presents highway modelling assessments that reflect these discussions.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	SPR has stated that foundation components would be manufactured onshore and delivered to site as close to fully assembled as practical. This also applies to the turbines and scour prevention materials, cable protection, cables and ancillary structures. Further clarity is needed in relation to this claim and whether the consequential impacts on transport have been fully assessed.	No decision has yet been made regarding a preferred base port for the offshore construction and operation of the proposed East Anglia TWO project. Such facilities would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights. This ES chapter therefore considers the impacts of constructing and operating the onshore infrastructure only.
Suffolk County Council and Suffolk	27.03.2019	The PEIR states that it is possible that wind turbines could be fully assembled and commissioned onshore and transported to site as a single unit installation. It is	

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Coastal District Council	Section 42 Consultation Response	understood that this method is being explored by the wind industry but SPR considers it is not possible to commit to this method as it is not technically proven at this stage. The Councils request clarity is provided by SPR on whether the impacts of the complete assembly of wind turbines have been included in the PEIR.	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The Councils have some concerns in relation to the assessment methods and threshold selection utilised within the Transport Assessments. A GEART methodology has been adopted during the preparation of the Transport Assessments to identify locations where impacts would occur but the Councils would not expect this method to be used as part of the DCO submissions and would suggest guidance such as WEB Transport Appraisal Guidance (WEBTAG). The Councils are also concerned that the severance and pedestrian/cycle amenity assessments fail to consider the facilities that are in place at the specific locations.	The Applicant has engaged with SCC regarding this comment and understand that the comment relates to the assessment of driver delay impacts. The assessment of driver delay within <b>section 26.6.1.11</b> of this chapter has been prepared in accordance with WEBTAG.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	In relation to the traffic data the employee car share ratio of 1.5 put forward by SPR is not accepted by the Councils. SPR also make assumptions based on worker origins but the effects of Sizewell C do not appear to have been considered. It is also assumed the construction workforce shift patterns will overlap with the PM peak hour but evidence from the EA1 project should be provided to identify whether the shift patterns overlap a with the AM peak hour. If this is shown to occur further assessment would be necessary. Further clarification is also required in relation to the peak daily movements identified by SPR to understand whether this is an average, and if so how much variance from the average exists and what the absolute peak is. Finally, the Councils wish for SPR to identify what methods would be utilised to control and monitor the traffic movements to ensure	The adopted car-share ratio has been discussed with SCC and it has been agreed that the ratio is acceptable if this forms a measurable and enforceable target within the Outline Travel Plan (OTP). The OTP, secured under the requirements of the draft DCO, has been submitted with this DCO application and includes this ratio as a target and provides details of measures, monitoring and reporting practices to ensure this target can be complied with.  With regards to worker origins, these have been informed by a socio economics study and provide a proportionate approach to quantifying potential employee distribution.

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		they are compliance with the data provided. Further information in relation to the Councils concerns regarding assessment methodology and threshold selection, trip distribution and traffic data utilised in the transport and traffic assessments has been detailed in Appendix E.	<p>The assessment of driver delay (presented within <b>section 26.6.1.11</b> of this chapter) has been updated to consider the potential overlap of the proposed East Anglia TWO project's traffic with both the network am and pm peak hours.</p> <p>With regards to peak HGV flows these comments have been discussed with SCC and it has been agreed that the numbers presented are representative of actual peak demand. In addition, these peak numbers have been adopted as a target within the OCTMP. The OCTMP, secured under the requirements of the draft DCO, has been submitted with this DCO application and includes details of the measures, monitoring and enforcement measures to ensure these peak numbers are not exceeded.</p>
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The site covers a large area of land on the east coast of Suffolk near to Leiston, Thorpeness and Friston, and as a result includes eight accesses with an additional four crossing points. Gaining access from the existing public highway is acceptable in principle to the Councils from a highway safety perspective following experience from similar projects such as EA1. The Councils have however expressed concerns in relation to the impact of the positioning of access 7 on the setting of Aldringham Court and protected woodland which has been detailed previously under the heading 'Aldringham Court'. For all of the proposed access arrangements, the Councils will require detailed design, swept path assessment and a road safety audit. The use of Design Manual for Roads and Bridges (DMRB) rather than Manual for Streets	<p><b>Appendix 26.18</b> provides designs including swept path analysis for each of the accesses and crossings. A Stage 1 Road Safety Audit and designer's response are provided within the Outline Access Management Plan (OAMP), secured under the requirements of the draft DCO, which has been submitted with this DCO application.</p> <p>Each of the accesses presented within <b>Appendix 26.18</b> have been designed in accordance with the DMRB. It has been agreed with SCC that the Manual for Streets standard is appropriate for the crossing of Grove Road.</p>

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		design guidance is considered by the Councils to be appropriate for the proposed access locations.	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	No consideration appears to have been given by SPR for how pedestrians or cyclists will access the site, including segregated facilities and cycle parking. The Councils would expect consideration to be undertaken to support safe travel by these modes as indicated as appropriate by NPS–EN1 and the NPPF.	The issue of pedestrians and cyclists accessing the sites accesses has been discussed with SCC. The Applicant has advised that due to the location of the proposed East Anglia TWO project and the workforce demographic there would be a limited number of employees who may be able to walk or cycle. Therefore, it has been agreed with SCC that it would be disproportionate to provide new pedestrian and cycle accesses.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	For Access 2 off Sizewell Gap Road, due consideration should be given towards the proposals for a cycleway associated with Sizewell C at this location and how the proposed footway could tie-in with this facility.	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The PEIR indicates that an outline Construction Traffic Management Plan (CTMP) would be submitted as part of the DCOs and would include details of the measures to be adopted to ensure that traffic demand forecasts are not exceeded, mitigation measures and Travel Plan measures, and the Councils would expect greater clarity on how the proposals will support sustainable transport including through protection of and improvements to the Public Rights of Way network.	An OTP is provided with the DCO submission, secured under the requirements of the draft DCO. The OTP provides details of proposed measures to support sustainable travel.



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Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	Although details of the sources of materials are not known at this stage the Councils accept that by assessing HGV movements in terms of 100% arriving from the north or south of the A12/A1094 junction is robust with the exception of the impact of such traffic on the junctions between Saxmundham and Lowestoft (i.e. A12/A144, A12/A1095, A12/A145).	This comment has been discussed with SCC and it has been agreed that detailed modelling of these junctions would not be required on the proviso that HGV traffic would not turn through these junctions. <b>Section 26.5.5</b> of this chapter of the ES confirms that HGV would not turn off at these junctions and therefore no further assessment has been presented. This commitment is also captured within the OCTMP, secured under the requirements of the draft DCO, has been submitted with this DCO application.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	A number of locations are included where daily traffic impacts have been identified, as set out in PEIR Table 26.22. The increase in vehicles varies between 1% and 10%, whilst the increase in HGVs ranges between 0% and 142%. Clearly the exact effect of any increase in traffic impact is dependent on local characteristics and sensitivities. A number of locations are included where peak hour traffic impacts have been identified, as set out in Table 26.24. There are noticeable traffic impacts at the five junctions identified, with peak hour impacts at A12/A1094 of 107 vehicles. Clarification is sought as to why the impacts are greater at A14 Junction 55 than A14 Junction 58 (Seven Hills roundabout), which is nearer to the proposal site. Given the impacts at A14 Junction 58, there are clearly a number of other junctions along the A14 corridor that are likely to be detrimentally impacted by the proposed developments, for which the projects do not include any mitigation. Further assessment should be undertaken of the impacts on the road network, including the A12 and the Leiston and Saxmundham town centre signal junctions.	This comment has been discussed with SCC and agreement reached on those junctions that require further assessment. The detailed junction modelling provided within <b>section 26.6.1.11</b> of this chapter reflects this agreement.

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Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	There will be further stress on a number of junctions as a result of the proposed development. The Councils expect SPR to mitigate the residual cumulative impacts of their development, so as to not be determined a severe highway impact as indicated as the appropriate test within the NPPF.	This comment has been discussed with SCC and agreement reached on those junctions that require further assessment. The detailed junction modelling provided within <b>section 26.6.1.11</b> of this chapter reflects this agreement.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	A cumulative impact assessment has been included assuming that EA1N and EA2 are delivered at the same time, this has been assessed as Scenario 1. As there is significant crossover between the two projects the cumulative impact is not as simple as an assessment of EA1N and EA2. The Councils are concerned there is no cumulative impact assessment that includes traffic associated with Sizewell C.	<b>Section 26.7.2</b> of this chapter includes a detailed assessment of the potential for cumulative impacts with Sizewell C New Nuclear Power Station.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	An assessment has been undertaken of the delays associated with the 'the pilot vehicle strategy', this includes a very simplified assessment based on a pilot vehicle taking three minutes to travel the distance and two vehicles arriving on average every minute. This results in an estimated average queue of six vehicles. Clearly given the potential for platooning and variation in arrival patterns, the maximum queue could be far more than the average. The assessment should identify the risks of the queue being greater than that indicated and what implications that has on road safety.	The Applicant has committed to removing the landfall access via Thorpeness Road (B1353). This has significantly reduced the numbers of HGVs that would pass through Aldeburgh and on to Thorpeness from that presented within the PEIR. The OCTMP provided with the DCO application, sets out measures to ensure that any HGVs that are required to pass through Aldeburgh (a peak of 10 two-way movements per day, 5 in and 5 out) would be of an appropriate size, or where the load cannot be carried by a smaller vehicle, the HGV would be escorted by a pilot vehicle.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019	The Councils note the Suffolk Automatic Traffic Count data shows significant difference in HGVs numbers in PEIR Table 26.11 compared to SPR Automatic Traffic Count and Suffolk County Council Manual Classified	<b>Section 26.5.2</b> of this chapter has been updated to note the difference in methodology.

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	Section 42 Consultation Response	Turning Counts; this is due to differing classification of HGVs. In Table 26.12 Link Based Sensitive Receptors the Councils consider there are a small number of errors or omissions: Link 3: For clarity include Stratford St Andrew (high sensitivity) Link 4c: For A12 read B1122 Link 6b: Church Common not a village but part of Snape The above issues should be addressed within the DCO submissions.	The comments on link descriptions have been incorporated within <b>section 26.5.3</b> of this chapter.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The AIL study (PEIR Appendix 26.01) has identified that although abnormal loads could come from either Felixstowe or Lowestoft, Network Rail has advised that a rail bridge over the A1094 should be avoided. This will result in all AILs regardless of origin travelling via the B1122 from Yoxford and passing through Leiston along the B1069 to the junction with the A1094 where localised widening is required. From this point the vehicle would then travel along the A1094 and B1121 through Friston to access the onshore substation sites over the new access road. It is presumed but not evidenced that this will remain the route for AILs required for future maintenance or replacement.	Upon completion of construction works, in the unlikely event that any of the transformers need to be replaced during the operational life of the proposed East Anglia TWO project, the Applicant would seek agreement with the relevant highway authorities regarding the timing and routing of any abnormal loads.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The Councils have significant concerns regarding the route from Felixstowe as it passes through Stratford St Andrew, Farnham, Yoxford, Leiston, Knodishall and Friston with issues such as footbridge on Park Hill, Leiston (height), pinch point on Haylings Road, Leiston (width) and Farnham (geometry) are well known. SPR should note AILs should only be routed through Friston when use of the temporary haul road is not a practical option (i.e. due to weight).	<b>Section 26.4.3.1.5</b> of this chapter identifies that there is uncertainty regarding the future availability of the abnormal load offloading facilities in Lowestoft. Therefore, the abnormal load study (provided within <b>Appendix 26.3</b> ) has considered both an option from Lowestoft and from Felixstowe. The abnormal load study identifies that both routes would be negotiable. Any future

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Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	For Heavy Loads the applicant is aware that the A12 Lowestoft to Yoxford and the B1122/Lovers Lane/Sizewell Gap from Yoxford to Sizewell is the approved AIL route to Sizewell A and B identified by Highways England as a 'Heavy Route' (HR100). The Local Highway Authority indicated its preference for this route to be used for AILs associated with this project (R100 is designated as weight group D, equivalent to a trailer weight of 264 tonnes across 12 axels or 299 tonnes across 14 axels).	movements would be subject to consultation with the relevant highway authorities prior to movement.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The Councils recommend that SPR engage with EDF Energy regarding their proposals at Sizewell C and what potential exists for use of their proposed Beach Landing Facility (BLF). This would significantly reduce the length of time that the AILs would spend on the road network, however it is recognised that this is: a) Outside of the applicant's control, and b) There may not be an appropriate route from the BLF to the substations. While work has recently been completed to protect the A12 at Blythburgh from tidal flooding both this area and that at Latimer Dam south of Kessingland remain susceptible to disruption from rising sea levels in the medium to long term.	There is no certainty that the Sizewell C New Nuclear Power Station proposals would come forward or that EDF Energy would be prepared to make their facility available to the Applicant.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	There is little mention of LGVs within the assessments. Appendix 26.11 of the PEIR contains information on the assessed number of HGV movements per month. For Landfall, Sections 1 to 4 and the substations there appears to be no reference to LGVs. The National Grid materials demands have been provided by National Grid and do include indicative LGV numbers. For the busiest quarter this equates to 2,540 LGVs, and assuming the same daily breakdown as the assessment method equates to an additional 38 movements on the average day. The Councils request confirmation that LGVs have been	The Applicant has discussed this comment with SCC and advised that the traffic numbers presented within <b>section 26.6.1</b> of this chapter have been derived from volumes of materials for HGVs and numbers of personnel for LCVs. The employee movements would be completed by a range of LCV types such as, cars, vans, pickups and minibuses. This matter, and the distinction between LGV and LCV vehicles, is clarified in the ES.

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		included in the assessments, both for the National Grid works and for all of the other sites, especially the substations which it is expected would generate LGV trips. Further to this, the Councils have concerns about what variance there is in LGV trips per day i.e. that if the average day is 38 LGVs for the National Grid works, what is the peak day. It is worth noting that EDF Energy as part of their consultation for Sizewell C indicated that the busiest day for materials could be as much as twice the average day. Given the apparent omission of LGV trips the Councils have concerns that the peak impact has not been assessed and the traffic impacts are being underestimated.	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The GEART guidance is one method of analysing the impacts in terms of risks to receptors it is considered to be a coarse tool which does not allow for factors such as junction geometry, design guidance (e.g. visibility) and most importantly the changes in traffic and driver behaviour. While the Councils accept it as an initial stage of investigation at this stage more detailed assessment will be required as part of the Transport Assessment supporting the DCOs.	The Applicant has engaged with SCC regarding this comment and understand that the comment relates to the assessment of driver delay impacts. The assessment of driver delay within <b>section 26.6.1.11</b> of this chapter has been prepared in accordance with WEBTAG.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	As set out within the consultation documents: "A total of 17 collisions have been recorded at this junction during the study period, resulting in 16 slight injuries and one serious injury. Eleven of the collisions involved vehicles turning across the path of traffic on the A12; nine of these involved vehicles turning right into the A1094 from the A12, including the serious collision, with the remaining two collisions occurring as vehicles turned right out of the A1094. Six of the collisions were rear end shunt type collisions; three within the central reserve, and three on the A1094 approach to the A12." Clearly the junction has a history of collisions, relating to right turning vehicle movements across the A12 and it is reasonable to	Detailed capacity modelling has been provided at <b>section 26.6.1.11</b> of this chapter. It is therefore considered that the primary mitigation of reducing the speed limit on the A12 from 50mph to 40mph would be appropriate and proportional. This approach is supported by research that highlights that every 1% decrease in average speeds produces a 3% decrease in the accident rate for higher speed rural single carriageway main roads.

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		assume that the proposed developments will further exacerbate these issues given the peak hour (9 HGVs and 64 cars) and daily (104 HGVs and 64 cars) increase of right turn movements from A12 south to the A1094 for the project.	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	It is evident from PEIR Table 26.13 that the B1121 (links 5 and 7) has a collision rate that is higher than the national average for a comparable road type and may be particularly sensitive to changes in traffic flow/type. In addition, the A1094 (links 6 and 8) has a collision rate that is just below the national average. These links (5, 6, 7 and 8) are considered potentially sensitive to changes in traffic flow and therefore need to be assessed further.	Noted – Detail is provided in <b>section 26.5.4.1</b> of this chapter.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The Councils consider that the impacts of construction traffic identified in PEIR Table 26.31, particularly HGVs have been underestimated on the following links: <ul style="list-style-type: none"> <li>· 2a Yoxford, 3a Farnham/Stratford St Andrew,</li> <li>· 3c Little Glemham/Marlesford,</li> <li>· 4b Theberton,</li> <li>· 5b Sternfield,</li> <li>· 7 Friston,</li> <li>· 10a Aldeburgh,</li> <li>· 13 Aldringham,</li> <li>· 14 B122 Leiston, and</li> <li>· 15 Knodishall/Leiston.</li> </ul> The majority of these settlements have narrow footways and few formal crossing facilities. The Councils also disagree with the comment that through the village of Theberton a footway is provided on at least one side of the road. The footway does not	SCC have further advised that the comment relates to the assessment of amenity and severance effects. <b>Section 26.6.1.8</b> of this chapter includes a more detailed review of the highway environment for each of the screened links.

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		extend to the extremities of the settlement and there is a small gap outside The Old Manor. The footway is narrow in places, as is the adjacent carriageway; with large vehicles overhanging the footway and no crossing points (dropped kerbs) are present.	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The Councils expect, unless there are exceptional circumstances, that pedestrian and cycling access will be maintained on closed sections of roads. Exceptions will only be accepted where it is physically impossible to do so (e.g. bridge removed) or it is unsafe to do so. In such cases alternative pedestrian and cycle routes must be provided along the shortest practical route.	Following consultation feedback the Applicant has committed to not closing any roads.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	Table 26.25 in the PIER considers the impact of road closures and set out a diversion route if one is available. In relation to the B1353 the table identifies that there is no acceptable diversion route. If the closure of B1122 is necessary SPR identifies that traffic travelling between Aldringham and Aldeburgh could be diverted via the B1069 and B1353. SPR has accepted that the B1353 is unsuitable for two HGVs to pass one another (hence the piloting scheme) and therefore the B1353 would only be acceptable as a diversion route for light goods vehicles and an alternative HGV would need to be provided.	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	Whilst escorting vehicles on the B1353 between Aldringham and Thorpeness is acceptable in principle in highway safety terms the details need to be agreed and carefully considered in relation to any residential amenity impacts. It is accepted that this method is less disruptive than closing the road (i.e. a delay of 3 minutes is less than the additional time taken to divert via Aldeburgh) but it will still cause inconvenience for the local community and tourists. It should be noted that the mechanisms for access by emergency vehicles remains to be agreed.	The Applicant has committed to removing the landfall access via Thorpeness Road (B1353). This has significantly reduced the numbers of HGVs that would pass through Aldeburgh and on to Thorpeness from that presented within the PEIR. The OCTMP provided with the DCO application, sets out measures to ensure that any HGVs that are required to pass through Aldeburgh (a peak of 10 two-way movements per day, 5 in and 5 out) would be of an appropriate size, or where the load cannot be carried by a

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			smaller vehicle, the HGV would be escorted by a pilot vehicle.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The Councils accept that the impacts on the highway during operation are relatively minor with the exception of any future major maintenance refurbishment or renewal and the support services based at local ports.	No decision has yet been made regarding a preferred base port for the offshore construction and operation of the proposed East Anglia TWO project. Such facilities would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights. This ES chapter therefore considers the impacts of constructing and operating the onshore infrastructure only.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The proposals could result in a significant increase in HGV movements on the A12, both to the north and south of Saxmundham. Although outside of the assessed highway network, the Councils believe that the majority of movements from the A12, especially the HGV movements would travel via the A14; this would exacerbate pre-existing issues along the route. EDF Energy's Stage 3 consultation for Sizewell C includes proposals for a bypass of the villages of Stratford St Andrew and Farnham. Without this mitigation in place all of SPR traffic from the south would travel through the two villages, with impacts on air quality, noise, severance, road safety and congestion, especially as a result of the pinch point at Farnham bend. The pinch point would result in an increase in HGV movements passing at the bend as	<b>Section 26.6.1</b> of this chapter provides detailed analysis of the potential severance, amenity, road safety and driver delay impacts within Farnham and Stratford.  Potential impacts upon air quality and noise are considered separately within <b>Chapter 19 Air Quality</b> and <b>Chapter 25 Noise and Vibration</b> .



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		well as in very close proximity to the footways increasing the risk to all road users. The impact of additional vehicles through this network should be proportionately mitigated. The proposed development would also result in an increase in HGV movements through the villages of Marlesford and Little Glemham resulting in impacts on air quality, noise, severance and road safety that should be mitigated.	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The Councils recognise that the A12 at Woodbridge would see some congestion without the development in the future; however, given the impacts of the developments on an already congested network, we would expect SPR to contribute towards mitigating their impacts at the location. The most effective way to address the additional pressures on the alternative routes is likely to be improvements to the A12, reducing the potential for re-routing as demonstrated by assessment of traffic for Sizewell C.	The Applicant has engaged with SCC regarding the extent of highway capacity modelling that would be required. <b>Section 26.6.1.11</b> of this chapter provides detailed junction and link capacity modelling that reflects this agreement.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	A12/A1094 The proposals for the junction are: <ul style="list-style-type: none"> <li>· A temporary reduction in the posted speed limit in advance of the junction from 50mph to 40mph;</li> <li>· Provision of enhanced warning signage to better highlight the junction to approaching drivers; and</li> <li>· Provision of rumble strips and associated slow markings, to provide an audible and visual warning of the hazard to approaching drivers.</li> </ul> The Councils consider that the improvements proposed for the A12/A1094 junction (Cluster 3) are not sufficient to reduce the significance from major to minor in PEIR Table 26.31. The junction has an existing high standard of signing including a speed enforcement camera and a reduced speed limit of 50mph. The Councils remain unconvinced that the proposed mitigation is sufficient given the significant increase in peak hour turning movements and daily HGV turning	Detailed capacity modelling has provided at <b>section 26.6.1.11</b> of this chapter, It is considered that the primary mitigation of reducing the speed limit on the A12 from 50mph to 40mph would be appropriate and proportional. This approach is supported by research that highlights that every 1% decrease in average speeds produces a 3% decrease in the accident rate for higher speed rural single carriageway main roads.

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		<p>movements as a result of the projects at the junction, with impacts on congestion and safety. The increased traffic on the A12 and A1094 will tend to decrease gaps on the A12 in both directions for traffic turning in and out of the A1094. As HGVs require greater gap times to turn safety this will increase the risk of misjudgement of gaps, a factor in past collisions and increase delays and frustrations for other drivers. EDF Energy is currently consulting on their proposals for Sizewell C, which includes a two-village bypass of the villages of Farnham and Stratford St Andrew. The proposals include a roundabout at the A12/A1094 junction to be delivered in the early years of their programme. The consultation documents indicate that SPR consider the traffic impacts a 'realistic worst case'. Appendix 26.15 of the PEIR provide indicative traffic flow diagrams for the EA1N and EA2 developments, these are for the combined average day of the peak, and show, if all materials were from the south a peak impact of 382 daily movements (128 cars and 254 HGVs) at the junction and 88 peak hour movements (64 cars and 24 HGVs). These represent the peak impacts, but the average peak impacts. There is some risk that, especially for the HGV movements there is significant variance in the number of potential trips on any day. It is worth noting that EDF Energy as part of their consultation for Sizewell C indicated that the busiest day for materials could be as much as twice the average day. Further to this, as indicated above, the Councils have concerns that the number of LGV movements has not been included in the assessment, meaning that the impacts for turning movements at the junction are even greater than being indicated. No localised junction modelling has been undertaken of the junction; however, the accident poor performance is likely to be a result of difficulty for</p>	

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		<p>vehicles to find gaps to undertake turning movements, and this is indicative of a junction where there is the potential for issues with capacity e.g. the delay at the junction means that drivers are undertaking risky turning manoeuvres. Further to this, the significant increase in HGVs will result in longer queues in the right turn lane. It is the Councils opinion that far more significant mitigation works are required for the junction. The increase in traffic will still mean that there will be fewer gaps for vehicles to undertake their turning manoeuvres, along with a significant increase in HGVs undertaking the manoeuvres. On top of these impacts is scenario 1. This includes a cumulative impact assessment with both EA1N and EA2 coming forward at the same time. Appendix 26.23 of the PEIR provide indicative traffic flow diagrams for the cumulative impact of the two developments, these are for the combined average day of the peak, and show, if all materials were from the south a peak impact of 498 daily movements (176 cars and 322 HGVs) at the junction and 120 peak hour movements (88 cars and 32 HGVs). Again, this does not include the LGV movements. Notwithstanding the comments above, all highway improvement schemes, unless otherwise agreed, should be subjected to detailed design, swept path assessment, junction modelling and a road safety audit, as part of the DCO submission.</p>	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	<p>A1094/B1069 The AIL study identifies the requirement for localised widening at the junction of the A1094/B1069. The proposed scheme should be subjected to detailed design, swept path assessment, junction modelling and a road safety audit as part of the DCO submissions. While analysis of past crashes has been undertaken and reported as showing no pattern other than driver error, consideration should be given to the changes in use and driver behaviour that</p>	<p><b>Section 26.4.3.1.5</b> of this chapter identifies that the requirement for localised widening at this junction is required to accommodate the swept path of the AIL vehicle. A concept plan of this widening is provided within <b>Appendix 26.4</b>. It is proposed that Stage 1 Road Safety Audit would not be required as the works would be temporary. The OCTMP, submitted as part of this DCO</p>

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		will occur as a result of construction traffic using this route.	application, includes a commitment to agreeing routes and accommodation measures with SCC prior to the movement of any AIL's.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	A1094/B1122 The proposals identify three options for mitigating the potential for delays associated with HGVs turning at the A1094/B1122 junction, these are: <ul style="list-style-type: none"> <li>· Requiring all HGVs to loop around the roundabout.</li> </ul> This strategy would be communicated to drivers through the issuing of delivery instructions and also supplemented by advanced signing; <ul style="list-style-type: none"> <li>· Requiring all articulated vehicles to be escorted by a pilot vehicle to hold back oncoming traffic; and</li> <li>· Undertaking minor localised carriageway widening.</li> </ul> Of the three options presented, the Councils consider that controlling traffic by pilot vehicles or other methods of traffic management is likely to cause the least disruption to road users based on the proposed number of large vehicles using this route. A number of locations are included where peak hour traffic impacts have been identified, as set out at PEIR Table 26.24. There are noticeable traffic impacts, which are yet to be fully assessed.	The Applicant has committed to removing the landfall access via Thorpeness Road (B1353). This has significantly reduced the numbers of HGVs that would pass through Aldeburgh and on to Thorpeness from that presented within the PEIR. The OCTMP provided with the DCO application, sets out measures to ensure that any HGVs that are required to pass through Aldeburgh (a peak of 10 two-way movements per day, 5 in and 5 out) would be of an appropriate size, or where the load cannot be carried by a smaller vehicle, the HGV would be escorted by a pilot vehicle.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	Cables may be placed directly underground at 1.2m depth without ducting, although ducting may be used in some or the entire route. The Councils would request that ducts are used within the limits of the public highway to avoid disruption to the highway later. Wherever possible the jointing bays will be located at the edge of field boundaries or roads to allow future access and jointing bays would not be permitted within the public highway.	<b>Chapter 6 Project Description</b> provides details of the cable installation methods that are considered. Detailed design post consent will confirm methods.
Suffolk County Council and Suffolk	27.03.2019	The temporary substation construction access haul road would in principle be acceptable as it would allow access to the substation avoiding Friston for works traffic.	Noted. Detail is provided in <b>Chapter 6 Project Description</b> .

**East Anglia TWO Offshore Windfarm  
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Coastal District Council	Section 42 Consultation Response		
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	In principle the Councils accept the proposal that traffic should be routed along strategic lorry roads identified within the Suffolk Lorry Route Network with limited access points via local roads. The Councils however disagree that while these local roads commonly handle large agricultural plant this is only on rare occasions and does not make them suitable for other large vehicles or loads.	The applicant considers that the roads identified within the Suffolk Lorry Route Network are suitable for HGV traffic.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	Pre-construction activities would include modifications to the highway such as the new access points. The Councils concur that these should be installed in advance of the main works providing access to the CCSs. In addition, early completion of offsite highway improvements would be required to facilitate access of HGVs and AILs to the CCSs.	Noted. Details would be provided in the final AMP submitted to discharge the requirements of the draft DCO.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	An Outline Access Management Plan will be submitted with the DCO applications and the Councils would expect to be consulted on this.	An OAMP, secured under the requirements of the draft DCO, is provided in support of the DCO submission.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	Additionally, four locations have been identified where the cable route crosses the public highways. These locations are identified as Crossing IDs within Figures 26.7 within Chapter 26 Traffic and Transport of the PEIR. Ingress or egress will not be sought at the Crossing IDs at Thorpeness Road and Grove Road, and traffic management will be employed to ensure safe crossing of the public highway by construction traffic along the onshore cable route haul road (including the Crossing ID locations on Aldeburgh Road and Snape Road). Modifications to the public	Any modifications to roads would be undertaken in consultation with SCC though the development of the final AMP and final CTMP post consent. These documents would be produced to discharge the requirements of the draft DCO.

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		<p>highway could potentially comprise:</p> <ul style="list-style-type: none"> <li>• Structural works to accommodate Abnormal Indivisible Loads;</li> <li>• Localised widening / creation of overrun areas;</li> <li>• Temporary moving or socketing of street signs; and</li> <li>• Temporary moving of street furniture.</li> </ul> <p>Any modifications to roads would be undertaken in consultation with and in accordance with the requirements of the Councils. Stage 1 safety audits will be expected to be provided as part of this process.</p>	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	<p>It is proposed in the consultation that minor road (those where two vehicles cannot pass) crossings across the public highway would be by open trenching techniques whilst maintaining one lane of through traffic at all times (with local widening) or through temporary closure to traffic. The Councils support the proposals to undertake temporary works such as widening the carriageway to avoid road closures causing delay and driver anxiety. Any road closures will require permission from the Suffolk County Council as Local Highway Authority following consultation with statutory organisations, unless included as specific measures in the DCOs. The proposed procedure for crossing major roads is the same as described for Minor Road Crossings except that generally the road will not need to be temporarily widened prior to beginning excavation. The Councils concur that temporary closures of major roads should be overnight or over a weekend to avoid disruption to road users and specifically public transport including school buses. Access for pedestrians and cyclist shall be maintained at all times.</p>	<p><b>Section 26.3.3</b> of this chapter identifies that there would be no planned road closures associated with the proposed East Anglia TWO project and that access for all road users would be maintained at all times.</p>

**East Anglia TWO Offshore Windfarm  
Environmental Statement**

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Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	An outline Construction Traffic Management Plan detailing temporary road closures, diversions and/or other local traffic management submitted with the DCO applications would be considered a minimum requirement by the Councils to comply with national policy and secure the assessed parameters within the DCOs. The outline CTMP will include: <ul style="list-style-type: none"> <li>• Details of the measures to be adopted to ensure that the traffic demand forecasts are not exceeded;</li> <li>• The mitigation measures to be adopted to manage the traffic and transport impacts;</li> <li>• Number and location of parking spaces including electric vehicle charging and facilities for cyclists;</li> <li>• Travel plan measures to manage construction employee movements and maximise use of sustainable travel options; and</li> <li>• Details of the proposed access works and traffic management.</li> </ul>	An OCTMP, OAMP and OTP are provided in support of the DCO submission, secured under the requirements of the draft DCO.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The proposals do not identify the car parking provision for staff. The proposed developments need to demonstrate that the proposed car parking can meet the calculated demand, whilst minimising the number of staff cars on the network through demand management and travel planning within the CTMP.	The OTP submitted with this DCO application includes details of the proposed numbers of parking spaces that should be provided. The number of proposed spaces seeks to ensure that the target of 1.5 employees per vehicle is managed whilst also managing the potential for overspill parking on the public highway
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The HGV Marshalling Area proposed along the B1353 at Elm Tree Farm is accepted in principle in highways terms as a practical method to manage deliveries of material and equipment for the landfall HDD.	The Applicant has committed to removing the landfall access via Thorpeness Road (B1353). This has significantly reduced the numbers of HGVs that would pass through Aldeburgh and on to Thorpeness from that

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The Councils consider that of the three proposed options the use of escorts for large vehicles is the safest and most practical. Widening will be disruptive and may still result in driver error causing vehicles to manoeuvre outside their lane and looping around the roundabout will not be understood by other drivers. The number of occasions this occurs can be reduced by careful programming by breaking of loads into smaller elements wherever possible.	presented within the PEIR. The OCTMP provided with the DCO application, secured under the requirements of the draft DCO, sets out measures to ensure that any HGVs that are required to pass through Aldeburgh (a peak of 10 two-way movements per day, 5 in and 5 out) would be of an appropriate size, or where the load cannot be carried by a smaller vehicle, the HGV would be escorted by a pilot vehicle.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	As stated previously the Councils are of the view that the permanent operational access to the substations off the B1121 should only be utilised for AILs when the temporary haul road is not a practical option or has been removed. Construction vehicles for the substation sites should also utilise the temporary haul route as the A1094/B1121 junction has not been assessed for its suitability for HGV movements and a left turn into the B1121 for eastbound traffic is difficult. Workers should also be encouraged to use alternative routes than the B1121 through Sternfield as SPR has identified it as a link with a higher than usual frequency of crashes. Once the haul road has been removed the AILs would need to be routed through Friston.	Upon completion of construction works, in the unlikely event that any of the transformers need to be replaced during the operational life of the proposed East Anglia TWO project, the Applicant would seek agreement with the relevant highway authorities regarding the timing and routing of any abnormal loads.  <b>Section 26.6.1.7</b> of this chapter details that it is proposed that traffic flows via link 5 (the B1121 through Friston and Sternfield) could increase by up to 6%. Increases in total traffic flows of less than 10% are considered to be within daily fluctuations and are therefore assumed to result in no discernible environmental impact.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	SPR has proposed two scenarios in relation to the cumulative impacts of the projects; the impacts have been assessed as if the projects have been built simultaneously or sequentially. The significant difference in transport terms are the duration of the impact of the schemes and peak HGV/worker trips. Building sequentially would generate a higher total number of trips due to the additional remediation necessary between the two projects and repeated	<b>Section 26.7</b> of this chapter provides a clear explanation of the construction scenarios that have been assessed.



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		<p>mobilisation. Building simultaneously creates a smaller overall trip total but a shorter duration and hence higher daily flows. It is acknowledged that SPR has included data in the PEIR appendices summarising the worst-case highway impacts in terms of highest maximum daily HGVs (EA1N and EA2 constructed at the same time will create the maximum total daily movements). However, the main report concentrates on individual scheme delivery (building sequentially) where the worst-case impact is the total number of vehicle trips although these are distributed over a longer duration and hence daily maximum flows lower. The different traffic flows for each scenario should be clearly explained and presented in the Transport Assessment supporting the DCOs.</p>	
<p>Suffolk County Council and Suffolk Coastal District Council</p>	<p>27.03.2019 Section 42 Consultation Response</p>	<p>SPR has not assessed the cumulative impact of the projects on traffic and transport with Sizewell C or other projects. SPR has stated within the chapters that the earliest date that construction could commence would be 2024; as such a baseline year for background traffic of 2024 has been derived for the purpose of the assessment. The Councils are concerned however that this would be after the Sizewell C early years scenario, meaning that Sizewell C traffic would be on the road network, and traffic would increase to the peak at 2027. SPR need to fully assess the cumulative impacts of the projects with Sizewell C and any other projects. The Councils would welcome SPR's commitment to work with EDF Energy to identify the cumulative impacts. The specific impacts would be the combination of both projects traffic on the A12 north of the A14 and the SPR traffic using the A1094 and B1069 in addition to light traffic accessing Sizewell. The specific cumulative impacts are considered by the Councils likely to be:</p> <ul style="list-style-type: none"> <li>· A12 Woodbridge (congestion)</li> </ul>	<p><b>Section 26.7.2</b> of this chapter includes a detailed assessment of the potential for cumulative impacts with Sizewell C New Nuclear Power Station.</p>

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		<ul style="list-style-type: none"> <li>· A12/A1094 junction, Farnham (road safety)</li> <li>· A12 Marlesford, Little Glemham, Stratford St Andrew and Farnham (Environmental, Severance, Pedestrian Amenity, Geometry/road safety at Farnham bends)</li> <li>· A12 / B1122 junction Yoxford (congestion, road safety)</li> <li>· A1094/B1069 and B1122 junctions at Snape, Sternfield and Knodishall (road safety).</li> <li>· The Councils are concerned that the poor visibility for westbound traffic turning into the B1121 at Sternfield has not been adequately considered.</li> <li>· Additional minor junctions accessing A12, A1094 and B1122 (road safety due to queuing on side roads)</li> <li>· Increase severance and loss of pedestrian amenity in settlements such as Theberton, Leiston, Aldeburgh, Knodishall and Snape</li> </ul> <p>Both EDF Energy and SPR will be expected to make proportionate contributions toward mitigating their impacts on the transport network.</p>	
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	SPR should note that the Councils express concern that highway mitigation will not be delivered before significant impacts occur on the local network and that the A12/B1122/A1094 haul routes should remain as free from disruption due to associated mitigation works as possible.	The OCTMP provided with the DCO application, secured under the requirements of the draft DCO, sets out mitigation measures including indication of when mitigation measures would be carried out. The Applicant would be prepared to accept a requirement relating to timing of highway mitigation works prior to significant HGV demand.
The Suffolk Coast DMO	27.03.2019 Section 42 Consultation Response	Travel and Transport detail is lacking. During the construction phases the local road network is unlikely to cope with the volume of HGVs, though Chapter 26 of the consultation documents have made it extremely difficult to judge the volume of traffic that will be generated.	<b>Section 26.6.1</b> of this chapter includes details of the increases in traffic along all links within the onshore highway study area and potential construction impacts.

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The Suffolk Coast DMO	27.03.2019 Section 42 Consultation Response	the consultation materials do not adequately consider the cumulative impact of EA1N, EA2 and the proposed Sizewell C construction traffic	<b>Section 26.7.2</b> of this chapter includes a detailed assessment of the potential for cumulative impacts with Sizewell C New Nuclear Power Station.
The Suffolk Coast DMO	27.03.2019 Section 42 Consultation Response	The consultants do not seem aware of the fragility of the A1094 and its congestion. The road experiences seasonal fluctuations, and this does not seem to have been assessed in the chapter.	During consultation with SCC (the local highway authority), SCC confirmed that a neutral period (i.e. no seasonality) could be adopted for the assessment. Background traffic flows presented within this ES represent 'annual averages' and therefore do not include for seasonality.
Royal Mail	27.03.2019 Section 42 Consultation Response	Royal Mail requests that careful consideration is given by SPR to the potential cumulative traffic impacts of this proposal together with those of the proposed Sizewell C New Nuclear Power Station. Royal Mail requests that Scottish Power Renewables provides information on the construction traffic mitigation measures that would be in place in the event that construction of the scheme take place in parallel.	<b>Section 26.7.2</b> of this chapter includes a detailed assessment of the potential for cumulative impacts with Sizewell C New Nuclear Power Station.

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