



The Planning Act 2008

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

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 3 - 15 December 2020

Comments of Suffolk County Council as Local Highways Authority

1. **Post hearing submissions including written submissions of oral case (if required).**
 - 1.1. See separate submission.
2. **Response to ExA's further written Questions (ExQ2) (if required).**
 - 2.1. Not applicable.
3. **The Applicants revised draft DCO (dDCO).**
 - 3.1. Not applicable.
4. **Any revised /updated SoCG (if any).**
 - 4.1. Not applicable.
5. **Comments on any additional information/submissions received by Deadline 2.**

Suffolk County Council Response to East Anglia One North and East Anglia Two Offshore Windfarms Clarification Note: Sizewell Projects Cumulative Impact Assessment (Traffic and Transport)

- 5.1. This section forms the Council's response to the Clarification Note 'Sizewell Projects Cumulative Impact Assessment (Traffic and Transport)' submitted by the Applicants at Deadline 2 of the Examination located here: ([https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002972-ExA.AS-6.D2.V1%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20\(Traffic%20and%20Transport\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002972-ExA.AS-6.D2.V1%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf).) This note forms a response to matters relating to the Cumulative Impact Assessment (CIA) of 'Traffic and Transport' only and does not provide comments on areas impacted by 'Traffic and Transport' such as air quality, and noise and vibration, which form part of other workstreams.
- 5.2. It is noted that Paragraph 9 of the CIA confirms that the Applicants are aware of potential changes to the Freight Management Strategy for the Sizewell C Development Consent Order (DCO) submission and that the Applicants will review and may need to update the CIA. This is noted and welcomed, and it is recommended that any updates are discussed with the local authorities.
- 5.3. Paragraph 7 refers to the SZC Transport Assessment (APP-602) including the transport impacts of the Sizewell B Relocation works. The Sizewell B relocation works were subject to a separate but identical planning application (DC/19/1637/FUL) that were granted permission. However, changes have been

made to the planned works, notably substitution of car parking within the existing Sizewell A and B sites for that proposed on Pillbox Field, and a new planning application made (DC/20/4646/FUL). The SZC DCO has not yet been updated to reflect these changes. However, the Highway Authority is satisfied that there is no material change to the transport impacts of the revised works.

5.4. Details of the planning applications can be found at:

DC/19/1637/FUL <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?keyVal=PQ5NVGQXJJ100&activeTab=summary>

DC/20/4646/FUL <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?keyVal=QJXP3GQX06O00&activeTab=summary>

- 5.5. At Paragraph 18 of the CIA, the Applicants set out that eight links were screened out of the DCO Environmental Statement (as indicated at paragraph 219 of Chapter 26 'Traffic and Transport'). These links have also been screened out of the CIA on the basis that they were screened out of the original assessment. It is not understood why these links would automatically be screened out for a CIA; the potential exists that the combination of impacts across the projects might result in an impact that triggers the original screening thresholds, that does not occur when looking at the Applicants' projects impacts in isolation. Further explanation is sought on whether any in combination impacts would occur that would mean impacts on these links should be further assessed.
- 5.6. It is noteworthy that Link 9 is the only link at 'Table 2.4 Pedestrian Amenity (Scenario A)' where a potentially significant impact has not been identified. It is understood that this is because the receptor has a low sensitivity, but the Magnitude of Effect of the impact is 'Medium'. As no criteria exists to determine where the differentiation is between a 'Medium' and 'High' Magnitude of Effect in 'Pedestrian Amenity' this is a judgement made by the Applicants whereby a 135% change in HGV flow is not considered to be 'High' Magnitude of Effect, which would result in a potentially significant effect. Justification of this reasoning is requested by the Councils.
- 5.7. There is a similar issue at 'Table 2.5 Pedestrian Amenity (Scenario B)', where Links 9 and 12 also have Magnitude of Impacts determined to be 'Medium' based on 131% and 166% changes in HGV numbers in Scenario B, as to how you define a High Magnitude of Effect, which would change the potential significance of the impact. Justification of this reasoning is requested by the Councils.
- 5.8. At Paragraph 29 of the CIA the potential for a Moderate Adverse Impact on Yoxford in the Early Years is identified. At Paragraphs 31 and 32, when assessing the impacts of the Project on this link it is determined that the Project would not proportionately contribute to a significant adverse cumulative impact. The rationale for dismissing the Projects' impact here is not understood. The

Project has a demonstrable impact on flows through these communities, representing in the order of 20 to 30% of the cumulative change in total vehicles and HGVs. It is also noteworthy that no assessment is undertaken of the proportional impact during the development representative hour and this should be explained. From the text, it appears that the Project is implying that any Sizewell C Early Years strategy would address the potential impacts. It is not understood how this is the case nor how the Applicant can guarantee this would occur, nor why the Projects should not proportionately reduce their impacts in this event.

- 5.9. At Paragraph 37 of the CIA potentially significant cumulative impacts at Marlesford are identified. Paragraph 39 notes that if these impacts occur SZC would provide mitigation through their proposed transport contingency fund. Again, it is determined at Paragraphs 40 and 41 that the Project would not proportionately contribute to a significant adverse cumulative impact. The rationale for dismissing the Projects' impact here is not understood. The Project has a demonstrable impact on flows through these communities, representing in the order of 20 to 25% of the cumulative change in total vehicles and HGVs. It is also noteworthy that no assessment is undertaken of the proportional impact during the development peak hour. It appears that the Project is implying that any Sizewell C Early Years strategy would address the cumulative impacts down to a level where they would not be significant. It is not understood how this is the case nor how the Applicant can guarantee this would occur, nor why the Projects should not proportionately reduce their impacts in this event. The Projects should proportionately contribute to mitigating their impacts.
- 5.10 At Paragraph 43 of the CIA the assessment identifies the potential for Moderate and Major Adverse cumulative impacts prior to the delivery of mitigation for Theberton. Paragraph 44 identifies that after the proposed Projects' mitigation at Theberton that the residual impacts are considered to be not significant with Paragraph 45 indicating that the Projects' peak traffic demand would not proportionately contribute to a cumulative significant adverse impact. The Councils have understood this to mean that the Applicant has concluded that their proposed mitigation reduces their impacts to a point where they are considered to not contribute to the significant impact at this location and we request that the Applicant confirms this understanding.
- 5.10. At Paragraph 55 and 56 of the CIA the assessment identifies that with the proposed Sizewell C mitigation the impacts on Lover's Lane can be considered to be not significant. However, there would be a significant impact prior to delivery of the mitigation. Consideration should be given by the Applicant to the level of traffic that can use these routes prior to delivery of the Sizewell C mitigation in Scenario A.
- 5.11. At Paragraph 57 of the CIA the Applicant identifies a potential moderate adverse impact at Link 12 (Sizewell Gap), but that due to the proposed speed limit reduction associated with Sizewell C and that it is implicit that the Projects peak demand would not proportionately contribute to a significant adverse impact. This

rationale should be further explained, the Project has a demonstrable impact on flows along this route, representing in the order of 20 to 30% of the cumulative change in total vehicles and HGVs. It is also noteworthy that no assessment is undertaken of the proportional impact during the development peak hour.

- 5.12. For the assessment of severance at Table 2.6 within the CIA, roads have been screened out where traffic flows on a road are less than 8,000 daily vehicle movements, based on advice set out with DMRB (Design Manual for Roads and Bridges). The Councils require further information as to where within DMRB this classification is made and what the basis for it is and how this assessment method interrelates with the proportion of traffic made up of HGVs. It is noteworthy that this was not used as an assessment method for the assessment of severance within Chapter 26 Traffic and Transport, and further clarification is needed as to why it is now being used as an assessment method.
- 5.13. It is important to note that the Council does not agree that the mitigation proposed by the applicant in para 75 is acceptable. Details of the Councils position have been included within the Local Impact Report 21.40 to 21.47.
- 5.14. <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-002772-DL1%20-%20Suffolk%20County%20Council%20-%20LIR.pdf>
- 5.15. The applicant has presumed that the highway improvements necessary to mitigate the SZC will be delivered to the EDF in a timely manner in accordance with the SZC implementation plan and hence mitigate the combined project impacts (eg A12/A1094 Farnham, paragraph 76 and 88, and A12/B1122 Yoxford, paragraph 90). The Council notes that delays in the delivery of SZC mitigation relative to EA1(N) and EA2's program could create combined impacts approaching those that have been considered significant in this assessment. The Council looks for both applicants to work cooperatively and that the construction management plans are robust to allow for monitoring, identification of developing impacts and their resolution if such delays occur.
- 5.16. **Deadline 2 Submission - Comments on Applicants' Comments on Responses to ExA WQ1.**
- 5.17. Located here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-002978-ExA.WQRs.D2.V1%20EA1N&EA2%20Applicants'%20Comments%20on%20Responses%20to%20the%20ExA%20WQ1s.pdf>
- 5.18. For information, at question 1.14.6 the Applicants' understanding of the Martlesham Heath development is incorrect in assuming that it will be completed by 2023. This fails to recognise that construction has not yet commenced of either the development or the associated highway mitigation measures and hence the development in its entirety will not be completed before the commencement of EA1(N) or EA2.

5.19. At question 1.8.5 it is set out that the potential for synergistic impacts on pedestrians, cyclists and motorists has been assessed within Chapter 26 of the Traffic and Transport Chapter. Further clarification is needed on how this assessment has been undertaken, and the conclusions for the synergistic impact on each link as limited information is provided within Chapter 26. However, it is not just the direct impacts of transport that have potential synergistic impacts, but, as an example how are the in combination impacts on Public Rights of Way, landscape, air quality and noise considered with these transport impacts on the recipients within communities?

5.20. At question 1.14.3, which is addressed to NNB Generation (SZC) Ltd the applicant 'note that they are not party to the Section 106 Agreement or the traffic review group, but will provide details of the EA2 and EA1N actual and forecast vehicle movements to the traffic review group in order to assist SZC's mitigation measures'. This implies that despite contributing around 20 to 30% of traffic using this link the applicant does not intend to contribute towards and mitigation considered necessary to mitigate the cumulative impacts of both projects. As set out in our response to the CIA, the Projects should proportionately contribute to mitigating their impacts.

6. Notification from any Affected Person of wish to speak at Compulsory Acquisition Hearing 2 (CAH2).

6.1. Not applicable.

7. Notification of wish to speak at any Issue Specific Hearings w/c 18 and 25 January 2021.

7.1. See separate submission.

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

8.1. Not applicable.