



East Anglia ONE North and East Anglia TWO Offshore Windfarms

Written Summary of Oral Case

Issue Specific Hearing 13 on 12th March 2021: Traffic and Transport

Applicants: East Anglia TWO Limited and East Anglia ONE North Limited

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Author: Shepherd and Wedderburn LLP

Applicable to East Anglia ONE North and East Anglia TWO

Submission of Oral Case: ISH13

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Glossary of Acronyms

AIL	Abnormal Indivisible Load
AONB	Area of Outstanding Natural Beauty
DCO	Development Consent Order
ESDAL	Electronic Service for Delivery for Abnormal Loads
ExA	Examining Authority
HGV	Heavy Goods Vehicle
ISH	Issue Specific Hearing
MOLF	Marine Offloading Facility
RSA	Road Safety Audit
SCC	Suffolk County Council
SoCG	Statement of Common Ground



Glossary of Terminology

Applicants	East Anglia ONE North Limited and East Anglia TWO Limited
East Anglia ONE North project	The proposed project consisting of up to 67 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 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.
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 substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North 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.
Projects	The East Anglia ONE North project and the East Anglia TWO project.





1 Introduction

- 1. This document is applicable to both the East Anglia ONE North and East Anglia TWO Development Consent Order (DCO) applications (the Applications), and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23 December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again.
- 2. The Issue Specific Hearing 13 for the Applications were run jointly and took place virtually on 12th March 2021 at 10:00am (Hearings).
- 3. The Hearings ran through the items listed in the agendas published by the ExA on 2nd March 2021. The Applicants gave substantive oral submissions at the Hearings and these submissions are set out within this note.
- 4. Speaking on behalf of the Applicants were:
 - partner at Shepherd and Wedderburn LLP;

 - transport planning technical director at Royal HaskoningDHV.



2 Agenda Item 2: Regional Freight Strategy – AIL and HGV

2.1 Choice of Port

2.1.1 Abnormal Indivisible Loads (AILs)

- 5. Highways England, on behalf of the Department for Transport, manage the movement of AlLs in England and have a policy known as the 'Water preferred policy (Guidelines for the movement of abnormal indivisible loads)' for the transport of AlLs. This policy directs that the "nearest coastal port" must be used to minimise the distance AlLs are transferred by road.
- 6. Based upon a review of the availability of suitable port facilities by industry heavy haul experts Wynns, ports at Lowestoft and Felixstowe were identified as being the nearest ports that could accommodate AIL deliveries. Lowestoft is the closest port, although its availability to receive the AIL delivery can only be established once the AIL delivery schedule is established. Felixstowe is a greater distance from the onshore development area and could only be used in the event that Lowestoft was unavailable.
- 7. Therefore, in accordance with the water preferred policy, the Applicants promote Lowestoft as a preferred AIL route with Felixstowe assessed as a contingency (should Lowestoft not be available).
- 8. In the **Statement of Common Ground with Highways England** (document reference ExA.SoCG-22.D8.V2), Highways England confirms that the "treatment of AIL within the [Environmental Statement] and the proposed routing of AIL movements associated with the Projects are acceptable".
- 9. The Applicants clarify that the Lowestoft heavy load facility (the Belvedere Yard) is on the south quay of Lowestoft Port and therefore the Projects' AlL haul would not be constrained by the load capacity of the bascule bridge on the A47.

2.1.2 Heavy Goods Vehicles (HGVs)

- 10. The freight assignments were agreed with Highways England and SCC during pre-application engagement.
- 11. The assignment of HGV traffic assumes that all HGV traffic would originate from an origin/destination outside of the onshore highway study area. The assessment considers a sensitivity test whereby 100% of the Projects' peak construction

¹ Highways England (2019), Water Preferred Policy: Guidelines for the Movement of Abnormal Indivisible Loads, available at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7998_33/WPP_guidelines_2019_DfT_consultation_revision.pdf



traffic demand is assigned to the A12 south (towards Ipswich and Felixstowe) and also 100% is assigned to the A12 north (towards Lowestoft and Great Yarmouth). It is therefore concluded that the assessment includes the flexibility for deliveries to travel from multiple supply chain origins (including ports).

12. These assignments have informed the **Sizewell C Cumulative Impact Assessment Note (Traffic and Transport)** (REP6-043) submitted at Deadline 6.

2.1.3 Outline Port Construction Traffic Management and Travel Plan

- 13. Ports may also be used for the import of materials and components during the onshore construction phase and for the construction and operation of the offshore facilities. Based on feedback from the East Anglia ONE Project, the offshore port activities will likely include:
 - Delivery of all the turbine components (towers, nacelles, switchgear and blades).
 - Assembly of towers and shipping to the windfarm site.
 - Crew Transfer Vessel port.
- 14. At this stage, the Applicants have not identified the port(s) to be used for offshore construction or for the ongoing operational management of offshore facilities. Accordingly, the *Outline Port Construction Traffic Management and Travel Plan* (an updated version has been submitted at Deadline 8, document reference ExA.AS-9.D8.V3) has been developed to secure further transport assessment should the need be established by the relevant highway authority after consultation with the relevant planning authority for the selected offshore construction port(s) or operation port(s).
- 15. It should be noted that many Ports have permitted development rights which secure large scale HGV/light vehicle movements.

2.2 Choice of Mode

2.2.1 Rail

- 16. Rail was not considered a viable solution for the transportation of the Projects' freight. This conclusion was based on the location of the existing rail head at Leiston which would serve to introduce HGV traffic on local routes to the west of Leiston and potentially increase HGV kilometres on local roads to serve the onshore cable route.
- 17. It was also considered that there are other challenges to overcome such as line upgrades, loading / storage infrastructure, securing train pathways and potential environmental knock-on impacts (e.g. noise) that indicated that rail import is not



a proportional approach to mitigation for the scale of the Projects' material demand.

2.2.2 Water

- 18. Similarly, a marine offloading facility (MOLF), was not considered a viable solution for freight transfer. Unlike Sizewell C, the challenge for the Projects is to serve a linear project(s) with multiple points of access. Land locks (Hundred River and SPA) and other constraints mean that a MOLF would only partially serve the on-shore cable corridor (potentially landfall and sections 1 and 2) but would require HGV transfer onto public highway for the remaining route and the substation site. Consideration was given to crossing the Hundred River with the temporary haul road however, this would require infrastructure to be in place for the entire duration of the construction of the onshore cable route and the onshore substations which would be contrary to the construction strategy at the hundred river and would represent an engineering challenge (gradient, ground conditions and flood risk). This would serve to induce 'shuttle' HGV trips on local roads, potentially doubling demand on some local routes.
- 19. It is also worth noting the construction of the MOLF would require additional road traffic associated with its construction and decommissioning and based upon work presented by Sizewell C could conservatively take up to one and a half years to construct.
- 20. It was therefore concluded that a MOLF was not a viable freight solution and water based transfer of freight was concentrated on a port strategy where there would be the facilities and environment to accommodate the Projects' demand.
- 21. The **Statement of Common Ground with NNB Generation Company (SZC) Limited** (document reference ExA.SoCG-18.D8.V2) confirms that ongoing communication will take place regarding co-ordination of the respective projects and opportunities (if any) will be explored.

2.2.3 Road

- 22. The Applicants' strategy for HGV access applies a hierarchical approach utilising the Suffolk Lorry Route network for the majority of journeys (96% of peak demand), to reduce the impact of HGV traffic on the most sensitive communities.
- 23. The Projects' assessment is based on a forecast worst case daily HGV demand of 270 HGV movements during peak construction. To contextualise (with reference to Appendix 26.23 (APP-549)) this demand is forecast to occur for one month only (month 34) for the total duration of the construction phase the average daily HGV demand is forecast to be at a much reduced 153 daily movements.
- 24. The A1094, B1069 and B1122 delivery routes are designated by Suffolk County Council (SCC) as a 'Zone distributor route' within the Suffolk Lorry Route



- hierarchy". A Zone distributor route links the strategic routes across Suffolk to local delivery routes and therefore by definition has been assessed by the highway authority as a suitable distributor for assigning volumes of HGV traffic to local routes. In keeping with this designation there are no restrictions (height, width, or weight) on HGV movements on this link.
- 25. The access locations have been carefully chosen to ensure that HGV demand is distributed around the Lorry Network rather than concentrated at a single or limited point. This ensures minimal local impact (for both Projects' simultaneously a 5% increase in total traffic is forecast on the A1094). Resulting AIL Routes and Movements
- 26. Appendix 26.6 Suffolk Lorry Route Network (extract) and Highways England Heavy and High Routes (extract) (APP-532) shows the extent of the Heavy and High Routes within England and Wales published by Highways England.
- 27. Heavy Routes are designated by Highways England on behalf of the Secretary of State. The Department for Transport Circular 61/72 was produced in direct response to a recommendation from the Ports Council to secure routes that were subject to frequent AIL use. The Projects are not going to generate the quantum of AIL movements during construction or operation to qualify as frequent use, in the way a large port development might.
- 28. The Applicants have sought further clarification from Highways England who have confirmed they are not minded to extend the Heavy Haul Routes in England and Wales.
- 29. Heavy Route 100 (HR100) is designated from Lowestoft to Sizewell B Nuclear Power Station. The A14 from Felixstowe and A12 north of Ipswich are not identified as Heavy Routes nor is the B1069 (Leiston) or B1121 (Friston).
- 30. A developer is not precluded from utilising alternative routes providing the water preferred policy is satisfied and the route is assessed for suitability and mitigated as necessary.
- 31. The Applicants commissioned heavy haul experts Wynns to undertake an assessment of the movement of the Projects' transformers. Wynns are the UK's leading heavy haul consulting engineers, with a 150 year history.
- 32. The report produced by Wynns is provided at *Appendix 26.3 Abnormal Indivisible Load Access to the Proposed East Anglia TWO and Proposed East Anglia ONE North Offshore Windfarm Substation* (APP-529). The report provides details of all the constraints between the ports (Lowestoft and Felixstowe) and the onshore substation access (access 13) and the processes



to be followed prior to application for movement. The report presents a series of photographs detailing constraints along the routes, photographs 27 to 31 provide information in relation to Leiston. The mitigation for Leiston is limited to vegetation clearance, removal of street furniture and lifting low hanging overhead cables. All AIL highway accommodation works will be covered in a Planning Performance Agreement with SCC.

- 33. An application for a Special Order movement is submitted via the ESDAL system (Electronic Service for Delivery for Abnormal Loads) and Highway England advise that to ensure that the necessary clearances can be obtained in good time from the Police, Highway and Bridge Authorities. Permission for the move should be requested 10 weeks prior to the scheduled date of the move. Approval is at the discretion of the Highways England. The Applicants also note that five clear days' notice to Police and to Road and Bridge Authorities (with indemnity) is required. All the Projects' Special Order AlLs will be subject to mandatory Police escort.
- 34. The Applicants note that two central islands are proposed on Abbey Road to the north of Leiston associated with a new development (DC/20/5181/OUT). It is understood that the final design of the islands is not progressed, but that the islands are required to assist pedestrians in safely crossing the road.
- 35. Central islands are not an uncommon feature along the public highway and can be negotiated by AILs. This typically involves, any street furniture (such as signs or railings) first being dismounted and then the kerbed island being over-sailed by the AIL (It is noted that the AIL trailers can be raised and lowered approximately 1m) on route. It is noted that the existing HR100 from Lowestoft to Leiston encompasses numerous central islands and splitter islands that AIL would need to negotiate. Appendix 26.3 Abnormal Indivisible Load Access to the Proposed East Anglia TWO and Proposed East Anglia ONE North Offshore Windfarm Substation (APP-529) identifies these features and proposes mitigation.

2.3 Need for Additional Works at Marlesford

- 36. Marlesford Bridge is on the Felixstowe to Friston contingency route. This is not a designated heavy load route and the structural information is less conclusive and therefore the Applicants have taken a cautious approach to load clearance.
- 37. The Applicants have retained heavy haul experts Wynns to evaluate the process for securing AIL access over the Marlesford Bridge. They advise: Prior to the movement of the transformers, the Applicants will undertake a three-stage process:



- Obtain up to date structural information from SCC to inform an initial comparative assessment. This will clarify if the load can be transported with no structural intervention and what haul precautions would need to be observed (noting the load presented in the Application is a worst-case 'Rochdale Envelope' of 280t);
- If the comparative assessment is negative or inconclusive, a more detailed survey will be undertaken to clarify bridge bearing capacity;
- If the above stage proves negative, a detailed engineering assessment will be undertaken to determine the form of temporary intervention.
- 38. Concerns have been expressed at the scale of mitigation required to secure the movement of the Projects' 280t transformer. It is important to note that it is not the total weight of an AIL that is the critical factor in determining the scale and scope of structural intervention, it is the axel weight and the total load acting on the bridge deck. By definition a smaller span bridge is easier to mitigate and in some cases can be overcome by the vehicle configuration and a manoeuvre plan alone.
- 39. Noting that the bridge span is 6.1m, the most likely structural intervention (if required) would be a temporary steel bridge placed over the existing bridge deck. There is potential for this intervention to be implemented under single lane closure, for a period of two days, to avoid the requirement to divert traffic.
- 40. SCC refer to a temporary bridge being utilised to secure a similar weight Transformer AIL movement from Ipswich Docks over the A137 Wherstead Road Bridge spanning Belstead Brook. It is understood this movement required the closure of that particular structure for 4 days over two weekends. However, direct comparisons cannot be drawn with Marsleford and the Wherstead Road Bridge as the latter is approximately four times the span (of the former) and therefore scope and scale of structural intervention would be far larger and completely different.
- 41. The area identified for laydown within Work No.37 will facilitate quick erection and dismantling of a (relatively small) temporary bridge intervention to minimise disruption to traffic.
- 42. The lead in time for a Transformer is between 12 and 24 months enabling advanced notice to be served to all highway stakeholders and a programme to be agreed with SCC to avoid local major events. It is therefore concluded that the driver delay impacts of the roadworks would not be significant.
- 43. The works area (Work No. 37) represents the land within which a temporary working area will be required for inspection access and to service the temporary



structural intervention if required (i.e. lay down, cranage, welfare and access). More detail on Work No. 37 is contained in the Applicants' *Written Summary of Oral Case (CAH3)* (ExA.SN5.D8.V1).

2.4 Good Planning and Integration – Consequential Effects

44. The Applicants note that this was discussed later on in the Hearings under Agenda Item 3 and a summary of the Applicants' submissions on this can be found at section 3.9 below.



3 Agenda Item 3: Local Freight Strategy – Construction and Operation

3.1 Marlesford: Need For and Extent of Works, Assessment of Impacts Post Consent

45. The *Outline Construction Traffic Management Plan* (and updated version has been submitted at deadline 8, document reference 8.9) confirms the Applicants have committed to pedestrian amenity mitigation in the form of footway improvements, proportionate to the Projects' contribution to the cumulative impact. The final concepts have been agreed with SCC and the proposed solution reflects the comments made by Marlesford Parish Council. These improvements would not conflict with future schemes proposed by Sizewell C or SCC.

3.2 A12/A1094 Friday Street Junction Update

- 46. SCC have responded at Deadline 5 (*Comments as Local Highways Authority* (REP5-055)) stating "SCC appreciates the efforts that has been made by the Applicants in looking to address its concerns relating to road safety at A12 / A1094 Friday Street junction and that it is satisfied with the 'concept' design".
- 47. Final details will be secured as part of the approval of the Construction Traffic Management Plan under Requirement 28 of the DCO. It has been agreed with SCC that a Section 278 agreement is the appropriate mechanism for delivery of the works and an agreement will be submitted at Deadline 8..
- 48. The *Outline Construction Traffic Management Plan* contains a commitment to regular reviews of the junction's safety performance in the form of an independent road safety audit (RSA) review. A stage 1 RSA has been undertaken on the concept design (as detailed in *Deadline 4 Traffic and Transport Clarification Note* (REP4-027)). Further stages are:
 - Stage 2 detailed design
 - Stage 3 just prior to/after scheme opening
 - Stage 4 12 month after opening.
- 49. The review team would consist of engineers independent from the design, SCC officers and the Police. Up to date accident records would be reviewed and recommendations made on the basis of the audit team's findings. The S278 makes provisions for the RSA process.

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3.3 HGV in Aldeburgh and Leiston

- 50. Recognising the geometry constraints at the Aldeburgh roundabout for articulated vehicles, the *Outline Construction Traffic Management Plan* includes a mitigation strategy that requires all HGVs (travelling via the Aldeburgh roundabout) to first travel to a construction consolidation site where loads can be broken down and placed on smaller vehicles. Where loads cannot be consolidated to smaller vehicles, HGVs are to be escorted by a pilot vehicle to section 3B.
- 51. HGV demand through the Aldeburgh junction accessing section 3B (westward of the Hundred River) would be limited to a maximum of 10 movements per day at times where the temporary haul road from access 9 (located off the B1069) is not available.
- 52. The Aldeburgh junction is protected by 24 hour waiting restrictions to prevent vehicles from obstructing the highway in the vicinity of the roundabout. However, a large HGV utilising the B1069 would have to traverse into the opposite lane to pass legally parked vehicles north of the restrictions. To place this in context the baseline traffic data present in *Chapter 26 Traffic and Transport* (APP-074) has been validated as recording 127 HGVs per day making this manoeuvre.
- 53. The Applicants have committed to the use of 'Stop Works' protocols to ensure the safe passage of construction HGVs. The conditions of the use of the Stop-Works sign is prescribed in the Department for Transport publication, <u>Traffic signs manual chapter 8 (part 1) road works and temporary situations design (2009)</u>. Chapter 8 says that:
 - The "STOP-WORKS" sign to diagram 7031 may be used only to stop traffic for a short period during works on or near a road, or during a temporary obstruction of a road...Two "STOP-WORKS" signs may be required in circumstances such as manoeuvring plant or works vehicles.
- 54. Traffic signals would be an alternative measure but would induce more vehicle delays than the simpler Stop Works protocols.
- 55. If no loads are consolidated a worst case HGV generation would be ten movements per day peak construction.
- 56. The *Outline Construction Traffic Management Plan* confirms that the Projects' HGV traffic and non-special order abnormal loads are not permitted to travel through Leiston.

3.4 HGV on A1094

57. The A1094, is designated by SCC as a 'Zone distributor route' within the Suffolk Lorry Route hierarchy. A Zone distributor route links the strategic routes across



Suffolk to local delivery routes and therefore by definition has been assessed by the highway authority as a suitable distributor for assigning volumes of HGV traffic to local routes. In keeping with this designation there are no restrictions (height, width, or weight) on HGV movements on this link and it is deemed suitable for the Project's HGV demand. The Applicants' validated baseline traffic counts indicate that the route is subject to daily HGV demand of 420 vehicles and overall flow of 8,082 vehicles. The Projects traffic demand would represent a 5% increase in daily traffic on the route. This increase would not be discernible from daily fluctuations in traffic and therefore would not lead to significant driver delay impacts.

- 58. The assessments contained in *Chapter 26 Traffic and Transport* of the ES (APP-074) and Appendix 26.2 (APP-528), as well as the subsequent modelling of Friday Street junction (*Deadline 4 Traffic and Transport Clarification Note* (REP4-027)) have been undertaken in accordance with current Department for Transport assessment guidance which directs that the assessment should be based on normal conditions (i.e. not during school holidays).
- 59. From an Environmental Impact Assessment (EIA) perspective, normal ('neutral') conditions represent a robust baseline as they provide a better indicator of the magnitude of effect of the Projects' traffic, whereas an elevated baseline would inadvertently reduce the magnitude of effect based on the percentage increase in traffic.
- 60. The approach to assessing road safety impacts involves detailed consideration of collision clusters and collision rates utilising Police (Stats 19) records to determine user groups (including cyclists and HGVs) and causation factors.
- 61. The junction of the A1094/B1069 (north) was raised as a possible safety concern.

 Chapter 26 Traffic and Transport of the ES (APP-074) included an assessment of the existing pattern of collisions occurring at the junction of the A1094 and B1069 (north) junction. This included consideration of the existing collisions occurring between the period of February 2013 and February 2018.
- 62. The analysis demonstrated that within the five year period considered, there had been a total of six collisions, all of which resulted in slight injury. Further analysis of the periods where the collisions occurred identified that of the six collisions, five occurred within 2013 and since then there has only been one collision in 2015. No collisions were recorded after 2015.
- 63. It was concluded that as five of the six collisions occurred within 2013 and there has only been one collision since (that is not attributable to the highway layout) there is not an emerging pattern of collisions at this junction that could be exacerbated by the Projects' traffic demand.



64. The Applicants are committed to ensure that the visibility splay is kept clear of vegetation and the road markings are renewed as necessary during the construction phase of the Projects' and this is secured in the *Outline Construction Traffic Management plan*.

3.5 AIL and HGV via Yoxford and Lovers Lane

- 65. Diverting the Projects Traffic demand via Oxford and the B1122 would reduce the numbers of movements along the A1094 through Snape. However, it would induce additional traffic movements through high sensitive communities of Yoxford and Theberton and also result in traffic having to pass through high sensitive communities which the Applicants' strategy precludes, namely Leiston, Knodishall and Coldfair Green.
- 66. The Sizewell C relief road (if available) would serve to intercept the Projects' HGV demand destined for landfall but, due to the linear nature of the projects would not serve the entire cable route or the substations and therefore there would be residual traffic demand on local sensitive routes. Should the Sizewell C relief road become available, the Applicants would seek to agree its utilisation with SCC in the submission of the final Construction Traffic Management Plan.

3.6 Need for Friday Street Improvements

- 67. The Applicants note that the clear objective of the Friday Street junction traffic signal scheme is to improve the baseline situation with regard to collisions.

 Chapter 26 Traffic and Transport of the ES (APP-074) assesses the road safety impact of the Projects' traffic demand and following a review of the collision history at the junction identified that the construction traffic demand could exacerbate the situation. The Applicants consider that the proposed improvements at Friday Street will help mitigate a pre-existing issue at the junction whilst in turn ensuring that the Projects do not further exacerbate that issue. This requires a small trade-off with A12 southbound delays which is accepted by SCC in their Deadline 5 comments (Comments as Local Highways Authority (REP5-055)) and at the Hearings.
- 68. The design of the proposed traffic signal junction has been developed in consultation with SCC to ensure that it is optimised to minimise delays and manage road safety.
- 69. The design was informed by two turning count surveys undertaken during June 2018. The junction modelling of the proposed signalised junction is presented in the *Deadline 4 Traffic and Transport Clarification Note* (REP4-027) for the network peak hours. It can be noted that with the application of background traffic growth and the Projects Peak traffic demand for a 2028 scenario, the junction would operate with spare capacity therefore delays would not be significant. It can further be noted that:



- the A1094 right turn in would be reduced to 41.3s from 51.61s; and
- the modelled delay of the A12 ahead and left turn is 24.5s.
- 70. To place these delays in context, a typical signalised junction cycle would be 90s, it is therefore concluded the modelled delays are not significant and would not induce motorists to reassign to other routes.
- 71. It has been assessed that the Sizewell C roundabout proposal would accommodate the Projects' traffic demand in a cumulative scenario. The *Outline Construction Traffic Management Plan* contains provisions for ensuring that the Friday Street signals are not implemented should it become apparent that the Sizewell C roundabout's implementation is imminent.

3.7 B1353 Crossing

72. The Applicants and SCC confirmed that there were no residual concerns in respect to this agenda point.

3.8 Accesses to Cable Route Section 3b

- 73. The three options required by the Applicants are:
 - Direct access off the B1122 Aldeburgh Road at access 5 and 6 (shown on Figure 26.2 - Access Locations and Associated Onshore Infrastructure (APP-307)), which is estimated to comprise up to 10 two way HGV vehicle movements per day (5 in and 5 out).
 - Direct access from Snape Road at access 9 (shown on Figure 26.2 Access Locations and Associated Onshore Infrastructure (APP-307)); or
 - Direct access from Sizewell Gap at access 2 (shown on Figure 26.2 -Access Locations and Associated Onshore Infrastructure (APP-307)).
- 74. The Applicants have sought to (and will continue to) minimise the use of Aldeburgh Road for HGV movements during construction of cable section 3b. As a consequence, in order to ensure the required HGVs and workforce continue to have safe and efficient access to cable section 3b, the Applicants require the three above accesses to be available. It is noted that HGVs accessing cable section 3b via access 2 cannot cross the Hundred River as the temporary haul road does not span the river. However, vehicles accessing via access 9 would access the area to the west and east of the Aldeburgh Road.
- 75. The Applicants commit to not using the Aldeburgh Road for access to cable section 3b whist the temporary haul roads from access 9 or access 2 are available.

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3.9 Good design – Mitigation and Legacy

- 76. The amenity footway improvements for Snape, Theberton, Marlesford and Yoxford would be adopted by SCC as permanent highway improvements and represent a legacy benefit.
- 77. In the event that there is a significant gap between the completion of the Projects' and the commencement of Sizewell C early works SCC have the option of retaining Friday Street signals and the associated road safety benefits. Good design is also included a joint statement with SCC in the SoCG

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4 Agenda Item 4: Cumulative Effects

78. The Applicants' note that this agenda item was not discussed in the Hearings and the ExA's questions were included in the Hearing Action Points for the Hearings. Please see the *Applicants' Response to Hearing Action Points (ISH10, ISH11, ISH12, ISH13, ISH14, CAH3 and ISH15)* (ExA.HA.D8.V1).