ID Number: 20026012

The Sizewell C Project, Ref. EN010012

Comments on any additional information/submissions received at D2

Suffolk County Council Registration ID Number: 20026012

Deadline 3 **24 June 2021**

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Please note: *Suffolk County Council comments on the updated Draft Deed of Obligation [REP2-059] and the revised Draft DCO [REP2-015] are submitted in separate documents.*

Preamble

A significant amount of additional information has been submitted at Deadline 2 by the Applicant, and whilst Suffolk County Council (SCC) has attempted to respond to as much as reasonably possible; due to the amount of information and to ensure an informed response, it would have been impossible to respond to all of the documents at this stage, and we reserve the right to comment further on updated documents at a later date.

Glossary of Acronyms

AD sites – Associated Development sites

AIL – Abnormal Indivisible Load

ATCs - Automatic Traffic Counters

BLF – Beach Landing Facility

CTMP - Construction Traffic Management Plan

CTWP - Construction Worker Travel Plan

D2 – Deadline 2

D3 – Deadline 3

DMS – Delivery Management System

DCO - Development Consent Order

HGV – Heavy Goods Vehicles

LEEIE – Land East of Eastlands Industrial Estate

LGV – Light Goods Vehicle

PROW – Public Right of Way

SCC – Suffolk County Council

SSSI – Site of Special Scientific Interest

TIMP – Traffic Incident Management Plan

TRG - Transport Review Group

[REP2-045] CONSOLIDATED TRANSPORT ASSESSMENT

1. SCC notes that the Applicant has submitted the Consolidated Transport Assessment at D2. Due to its size and complexity, and the limited time available between D2 and D3, it has not been possible for SCC to review this document in detail and respond at D3.

[REP2-044] IMPLEMENTATION PLAN

2. The Applicant has submitted at Deadline 2 an update to the Implementation Plan [REP2-044]. SCC provides in the section comments on the Implementation Plan compared to the previous version [APP-599], as well as considerations of its enforceability. SCC considers the Implementation Plan to be closely interlinked with the transport management plans, particularly the Construction Traffic Management Plan (CTMP), which are discussed in subsequent sections of this submission.

Commentary on changes of [REP2-044] compared to previous version [APP-599]

3. The changes to the Implementation Plan ([REP2-044] compared to [APP-599]) are broadly welcomed by SCC as the Local Highway Authority.

4. In particular, the proposed delay of Phase 2 – Bulk Earthworks from 12 months after Final Investment Decision [APP-599] to 24 / 27 months after Final Investment Decision [REP2-044] (Plate 1.1) is considered helpful, as this now enables completion of the highway, marine and rail improvements prior to commencement of this phase. This change does represent a compression of phase 2 from 39 months [APP-599] to 26 months [REP2-044]; as the Applicant does not identify this requiring a change to the haulage requirements for the project, this would not be of concern to SCC. The Implementation plan refers to 6.3 Volume 2 Main Development Site Chapter 3 Description of Construction dated 25/06/2020 (APP-184) which in turn refers to V1.0 of the Implementation Plan (APP-599) and table 3.2 and 3.3 to the previous quantities of materials (ie 10.1 million tonnes) rather than the current estimate of over 12 million tonnes. SCC seeks confirmation that the construction phasing in V2.0 of the Implementation Plan is based on the updated materials requirement.

5. SCC notes that many of the activities in Phase 1 will already generate significant HGV movements. This considerable volume of construction traffic in advance of the Bulk Earthworks (phase 2) can be explained by the construction works included in Phase 1 (as stated in [APP-184] Chapter 3 Description of Construction dated 25/06/2020), i.e.:

- construction of the cut off wall and cut of wall platform (para 3.4.29),
- SSSI crossing (para 3.4.35),
- construction roads (para 3.4.39)
- Initial coast defence structure (para 3.4.42)
- establishment of construction area within the main site (para 3.4.130),
- LEEIE construction areas (para 3.4.191).

6. SCC welcomes the proposed accelerated construction of the northern park and ride, A12/A144 junction and other minor highway improvements (Plate 1.1 [REP2-044]) in comparison to the previous version [APP-599].

7. However, SCC is concerned that the A12/B1122 junction at Yoxford is now delayed until 6 months after Final Investment Decision (Plate 1.1). This location is a critical pinch point in the highway access to Sizewell C and a significant amount of work is required within the existing highway limits to tie in the new roundabout with no suitable diversion route for the B1122 traffic.

8. To gain a better understanding of the interrelationship of the phasing, and resulting demand for Associated Development facilities, SCC considers that it would be very helpful to include profiles of HGV movements and numbers of workers within Plate 1.1. This would assist in setting suitable controls and assist future monitoring to ensure key assumptions in the modelling remain valid.

9. The removal phase for the permanent beach landing facility (Plate 1.1 [REP2-044]) is presumed to refer to taking down of the deck structure but this should be clarified.

10. Clarification is requested as to whether the Accommodation Campus could be delivered in more than one stage so that partial use of the Campus could be brought forward within the Implementation Plan.

11. It is noted that a 3-month mobilisation prior to commencing work within the public highway, as suggested in Plate 1.1 [REP2-044], will require considerable co-operation prior to Final Investment Decision ID so that the necessary traffic regulation orders can be provided and that works co-ordinated with SCC as the Local Highway Authority and other undertakers.

12. The Applicant notes (at paragraph 1.2.4 [REP2-044]) that approvals and consents are not within its control. To reduce this risk SCC would consider entering into an agreement with the Applicant to formalise the processes, deliver to required timescales and provide resources as far as reasonably practical.

Enforcement of the Implementation Plan

13. The phasing schedule (Plate 1.1 [REP2-044]) within the Implementation Plan [REP2-044] is proposed to be indicative (paragraph 1.2.1). It is proposed (in paragraph 1.1.4) that "the Deed of Obligation will confirm that SZC Co. shall use reasonable endeavours to carry out and complete the above mitigation measures in accordance with the Implementation Plan, unless otherwise agreed with the local authority."

14. SCC comments on the use of "reasonable endeavours" in its D3 submission **Comments on the draft Deed of Obligation**.

15. It is important to SCC that there is a level of enforceability to ensure that mitigation measures are in place before major highway impact occurs. We note that at Hinkley Point C, the completion of most of key transport infrastructure (road related associated development sites as well as the jetty and Combwich Wharf) was delayed compared to the original DCO plans (see Table 1 below). This reinforces the need for suitable, enforceable measures or controls to prevent the assumptions in the transport assessment and environmental statement being invalidated.

Table 1. Hinkley Point C – Original programme compared to reality

Planning compared to reality

AD Element	Original Programme	Planned Operation	Construction Programme	Finished	Time from Transition
Temporary Jetty	1 year	Q2 2013	1 year 8 mths	Aug 2018	2 years 2 mths
On Site Campus	1 year	Q2 2014	1 year 2 mths	May 2018	1 year 11 mths
Bridgwater Campus	2 ¼ years	Q1 2015	1 year 7 mths	Jan 2019	2 years 7 mths
J23 P&R	1 ½ years	Q2 2014	1 year 6 mths	Jan 2019	2 years 7 mths
J24 P&R	½ year	Q2 2013	4 mths	Dec 2016	7 mths
Cannington Bypass	1 ¾ years	Q3 2014		Dec 2015	7 mths early
Cannington P&R	¾ year	Q3 2013	11 mths	Jul 2018	2 years 1 mth
Williton P&R	¾ year	Q3 2013	6 mths	Sep 2018	2 years 3 mths
Combwich Wharf	1 year	Q1 2014	1 year 1 month	Nov 2019	3 years 5 mths

Source: Somerset local authorities presentation to the New Nuclear Local Authorities Conference, June 2019

16. Where the phasing and completion of AD sites is not secured directly through requirements, SCC considers that it will be critical to have more stringent controls and caps on vehicle movements in place until the completion of key mitigation sites, to avoid greater than acceptable impacts on the transport network and communities. This is particularly important if the overall programme or elements of the programme become delayed. Controls and caps are being proposed by the Applicant to be part of the Construction Traffic Management Plan (CTMP), but currently fall short of the expectations of SCC - further comments on this in the next two sections below.

17. SCC notes that the proposals for caps in the CTMP only relate to caps for HGVs. No caps are proposed in relation to the size of the workforce (or workforce related bus and car movements), and neither is it proposed that the delivery timetable of the accommodation campus and caravan site can be enforced. This is of some concern, both in relation to the housing impact on local communities, and in relation to the transport impact of an increased number of workers needing to commute to the site if the campus is completed late. Consideration may be given to caps beyond HGV caps, e.g. for buses.

18. It will be critical to have robust monitoring of the workforce, including use of accommodation. If this is available, it can give early warning if the assumptions made in the gravity model, which underpins most of the assessments, are incorrect and unforeseen impacts may arise. Contingency measures would then have to be brought in place. The data can also be used as an early warning to trigger investigation before controls are exceeded or impacts arise from incorrect assumptions.

[REP2-054] AND [REP2-055] - OVERARCHING TRANSPORT MANAGEMENT PLAN COMMENTS

19. The Construction Worker Travel Plan (CWTP) [REP2-055] and the Construction Traffic Management Plan (CTMP) [REP2-054] are closely interlinked in terms of impacts on highways. This section sets out strategic comments that apply across the two plans.

20. The CWTP and the CTMP, as prepared, are very much planning documents and do not, at this stage, represent useable documents for a Transport Co-ordinator and Delivery Manager. A significant proportion of the document is not required for day-to-day use. Information included in both documents should be clearly set out and not rely on the user to refer to other documents such as the Consolidated Transport Assessment. The information which should be clearly set out within the plans, includes, but is not limited to:

    - Roles
    - Responsibilities
    - Timeframes
    - Monitoring process
    - Caps
    - Targets
    - Measures
    - Plans showing the location of car parks, facilities, amenities and routes which should be adhered to.

21. SCC expects a baseline survey to be carried out for both the CWTP and CTMP to understand the existing levels of traffic and movements on the main routes serving the construction sites to provide a comparison to the first ‘with Sizewell C’ survey.

22. To assist with validation of the information contained within the DMS and that obtained from the monitoring process, which is to only occur on a single day of the month/quarter, (which is not agreed with SCC as sufficient), and in the absence of suitably agreed monitoring that goes beyond what is currently proposed, it is recommended that permanent Automatic Traffic Counters (ATCs) are installed at the site access, on

the main vehicular routes to the site, at the LEEIE access and at the accesses or on approach to the Park and Ride sites. This would account for any daily and seasonal variation which occurs.

Suitability of proposed caps, controls and monitoring arrangements

23. Currently, there is no clear overview within the CTMP and CWTP of all caps proposed. SCC requests that all caps are clearly set out within a table within the CTMP and CWTP, or potentially an overarching table for both the CTMP and CWTP to highlight how each movement is monitored and controlled. This would be beneficial for highlighting the extent of the documents and for implementation. This should include the separate controls for weekdays and weekends.

24. It will be essential for the CTMP and CWTP to include a clear definition of “Early years”. SCC considers that this definition needs to refer to all offsite associated development, as set out in Plate 1.1 of the Implementation Plan [REP2-044], needing to be completed and operational before transitioning into “peak years”. This is considered appropriate as the early years caps and controls are in place to limit highway impacts in advance of these highway mitigations being operational.

25. Little detail is provided on the penalties applied should controls be breached or targets not achieved. It is understood that there are two funds available to implement improvement measures; however, greater clarity is required on the action to be undertaken in terms of measures and initiatives in the event of controls being breached.

26. SCC considers that the proposed caps, controls and monitoring measures are not sufficient to protect the highway network from impacts, and seeks additional controls and monitoring. Table 2 sets out the controls and monitoring requirements proposed by the Applicant (second and third column), as well as the additional controls and monitoring requirements sought be SCC (fourth and fifth column). The section “Transport risks identified from the transport modelling” (paragraph 15.59-15.72) in Local Impact Report [REP1-045] provides a rationale for the proposed controls.

Table 2. Summary of Controls and Monitoring

Category	Controls proposed by the Applicant	Monitoring proposed by the Applicant	Additional Controls requested by SCC	Additional Monitoring requested by SCC
Modal split				Monitoring of materials delivery modal split between marine, rail and road, to demonstrate aspirations are achieved
Early Years HGVs to the Main Site	300 deliveries (600 movements) on Monday to Fridays – paragraph 4.4.6 of the CTMP. 250 deliveries (500 movements) on Saturdays – paragraph 4.4.6 of the CTMP. No movements on Sundays or public holidays – paragraph 4.4.6 of the CTMP. Controlled to agreed HGV routes – paragraph 4.4.3 of the CTMP. Cap on peak hour movements between 08:00 and 09:00 and 17:00 to 18:00 – paragraph 4.4.11 of the CTMP. No HGVs will arrive outside the hours of 07:15 and 21:00 – paragraph 4.4.13 of the CTMP. No HGVs will depart the main site later than 23:00 – paragraph 4.4.13 of the CTMP. On Saturdays no HGVs will arrive outside the hours of 08:00 to 13:00 – paragraph 4.4.13 of the CTMP. On Saturdays no HGVs will depart the main site later than 14:00 – paragraph 4.4.13 of the CTMP	HGVs are monitored using GPS data through the DMS. – Paragraph 4.4.17 of the CTMP	Limits on each route to reflect north (15%) / south (85%) split as assessed within the ES. Peak hour controls should include 07:00 to 08:00 period and 16:00 to 17:00 period to those HGV figures assessed within the TA. Controls on the average Typical Day movements for each quarter - to an average of 250 deliveries (500 movements) per day.	To assist with validation of the information contained within the DMS and that obtained from the monitoring process, it is recommended that permanent ATCs are installed at the site access, on the main vehicular routes to the site, and at the accesses or on approach to the Park and Ride sites. Reporting of HGVs should include journey times using GPS data.

Category	Controls proposed by the Applicant	Monitoring proposed by the Applicant	Additional Controls requested by SCC	Additional Monitoring requested by SCC
Early Years HGVs between main site and LEEIE	No HGVs will arrive outside the hours of 07:00 and 21:00 – paragraph 4.5.3 of the CTMP. No HGVs will depart the main site later than 23:00 – paragraph 4.5.3 of the CTMP. On Saturdays no HGVs will arrive outside the hours of 08:00 to 13:00 – paragraph 4.5.3 of the CTMP. On Saturdays no HGVs will depart the main site later than 14:00 – paragraph 4.5.3 of the CTMP.	HGVs would not be tracked using GPS, but the number of movements would be recorded via the DMS-tracker – paragraph 4.5.2 of the CTMP.	A control that either no HGVs to/from the wider network would travel to/from the LEEIE or a control on the number of HGV movements between the LEEIE and Main development site to those assessed within the ES and TA.	To assist with validation of the information contained within the DMS and that obtained from the monitoring process, it is recommended that permanent ATCs are installed at the site access, and at the access to the LEEIE.
Peak Years HGVs to main site	350 deliveries (700 movements) on Monday to Fridays – paragraph 4.4.6 of the CTMP. 250 deliveries (500 movements) on Saturdays – paragraph 4.4.6 of the CTMP. No movements on Sundays or public holidays – paragraph 4.4.6 of the CTMP. Controlled to agreed HGV routes – paragraph 4.4.3 of the CTMP. Cap on peak hour movements between 08:00 and 09:00 and 17:00 to 18:00 – para 4.4.11 CTMP No HGVs will arrive outside the hours of 07:00 and 21:00 – paragraph 4.4.13 of the CTMP. No HGVs will depart the main site later than 23:00 – paragraph 4.4.13 of the CTMP. On Saturdays no HGVs will arrive outside the hours of 08:00 to 13:00 – para 4.4.13 of CTMP. On Saturdays no HGVs will depart the main site later than 14:00 – para 4.4.13 of the CTMP.	Monitored using GPS data through the DMS. – Paragraph 4.4.17 of the CTMP	Controls on the Typical Day movements to 250 deliveries (500 movements) each quarter. Limits on each route to reflect north HGV (15%) / south (85%) split as assessed within the ES. Peak hour controls on HGVs to include 07:00 to 08:00 period and 16:00 to 17:00 period to those figures assessed within the TA.	To assist with validation of the information contained within the DMS and that obtained from the monitoring process, it is recommended that permanent ATCs are installed at the site access, on the main vehicular routes to the site, and at the accesses or on approach to the Park and Ride sites. Include reporting of HGV journey times using GPS data.

Category	Controls proposed by the Applicant	Monitoring proposed by the Applicant	Additional Controls requested by SCC	Additional Monitoring requested by SCC
Peak Years HGVs between main site and LEEIE	No HGVs will arrive outside the hours of 07:00 and 21:00 – paragraph 4.5.3 of the CTMP. No HGVs will depart the main site later than 23:00 – paragraph 4.5.3 of the CTMP. On Saturdays no HGVs will arrive outside the hours of 08:00 to 13:00 – paragraph 4.5.3 of the CTMP. On Saturdays no HGVs will depart the main site later than 14:00 – paragraph 4.5.3 of the CTMP.	HGVs would not be tracked but the number of movements would be recorded via the DMS-tracker – paragraph 4.5.2 of the CTMP.	A control that either no HGVs to/from the wider network would travel to/from the LEEIE or a control on the number of HGV movements between the LEEIE and Main development site to those assessed within the ES and TA.	To assist with validation of the information contained within the DMS and that obtained from the monitoring process, it is recommended that permanent ATCs are installed at the site access, and at the access to the LEEIE.
HGVs to the Associated Development sites	Stipulated to use HGV routes – paragraph 5.3.1 of the CTMP. Indication of timing restrictions that movements will not happen outside of 07:00 to 19:00 hours – paragraph 5.3.5	The number of HGV movements will be recorded via DMS Booker – Paragraph 5.3.4	Confirmation of HGV routes as indicated within the CTMP. Confirmation of timing restrictions as indicated within the CTMP. Controls on number of HGVs to assessed numbers for each associated development site. Peak hour controls for 07:00 to 08:00, 08:00 to 09:00, 16:00 to 17:00 and 17:00 to 18:00 to those figures assessed within the Transport Assessment.	Monitoring of routes used potentially through GPS within each HGV or the phone app at paragraph 4.4.30 for smaller contractors. This would require commitment to develop the app. Monitoring of the number of HGV movements. Monitoring of the timing of HGV movements. Confirmation that exceedance of assessed figures would constitute a breach.
LGVs to main site	The number of LGV movements to the main site will be recorded via the DMS-booker – paragraph 6.2.3 of the CTMP	Monitoring of the average and peak LGV numbers via the DMS booker – Table 8.1 of the CTMP	Exceedance of LGV peak numbers should be considered to be a breach.	If phone app is being used for HGVs, it would be useful to use this also for monitoring LGVs and their routeing.

Category	Controls proposed by the Applicant	Monitoring proposed by the Applicant	Additional Controls requested by SCC	Additional Monitoring requested by SCC
LGVs to other sites	No controls are proposed for LGV movements to the Postal Consolidation Facility No controls are proposed for LGV movements associated with the construction of the Associated Development Sites	No monitoring is proposed	Controls on the total LGV movements to the Postal Consolidation facility as assessed within the ES and TA. No LGV movements to the Associated Development Sites aside from those associated with worker arrivals and departures.	Monitoring of the number of LGV movements to the Associated development sites. If phone app is being used for HGVs, it would be useful to use this also for monitoring LGVs and their routeing.
AILs and Abnormal loads	Sizewell C will seek to utilise the permanent beach landing facility spare capacity to deliver temporary construction AILS by sea. Adhere to the AIL time limits as set out within Norfolk and Suffolk Constabulary guidance (AILS would be permitted to travel before 07:30 or after 18:00, subject to it being daylight and between 09:00 and 16:30)	Monitored through the DMS – paragraph 7.2.11 and Table 8.1 of the CTMP	A control on the maximum number of AIL and abnormal load movements during any day/week/quarter. A clear process to ensure that all available marine capacity is utilised.	Monitoring of numbers of AILs/abnormal loads and mode of delivery (marine/rail/HGV) Monitoring of AIL/abnormal loads journey times using GPS data
Direct Buses	Routes, bus stops and timetable approved by the TRG – Paragraph 4.3.6 of the CWTP. Any changes to the routes, bus stops and timetable approved by the TRG – Paragraph 4.3.6 of the CWTP	GPS tracking data on buses average over one week during each quarter.	SCC does not request additional controls as we encourage maximising Home-based worker figures and transport by bus for these workers, provided this does not result in additional material environmental impacts.	To assist with validation of the information contained within the DMS and that obtained from the monitoring process, it is recommended that permanent ATCs are installed at the site access, on the main vehicular routes to the site, and at the accesses or on approach to the Park and Ride sites.

Category	Controls proposed by the Applicant	Monitoring proposed by the Applicant	Additional Controls requested by SCC	Additional Monitoring requested by SCC
Park and Ride Buses	It is not clear whether the 'direct bus' controls are proposed on the Park and Ride bus movements.	GPS tracking data on buses average over one week during each quarter.	Park and Ride bus routes to utilise HGV routes Park and Ride bus number not to exceed the daily numbers as assessed within the ES without approval of the TRG. Park and Ride numbers not to exceed the peak hourly numbers as assessed within the ES without approval of the TRG.	GPS monitoring of park and ride bus routes. To assist with validation of the information contained within the DMS and that obtained from the monitoring process, it is recommended that permanent ATCs are installed at the site access, on the main vehicular routes to the site, and at the accesses or on approach to the Park and Ride sites

Category	Controls proposed by the Applicant	Monitoring proposed by the Applicant	Additional Controls requested by SCC	Additional Monitoring requested by SCC
Workers journeys to main site	Mode share targets as set out at Table 3.1 of the CWTP.	Count of Staff mode share and vehicle numbers one day per quarter as per Table 5.1 of the CWTP. Profile of bus arrivals and departures from the main site as per Table 5.1 of the CWTP. Main development site car park utilisation as per Table 5.1 of the CWTP.	Total vehicle movements to the main site and if exceeded should constitute a breach.	To assist with validation of the information contained within the DMS and that obtained from the monitoring process which is to only occur on a single day of the month/quarter, in the absence of suitably agreed monitoring that goes beyond what is currently proposed, it is recommended that permanent ATCs are installed at the site access, on the main vehicular routes to the site, and at the accesses or on approach to the Park and Ride sites. This should include 15-minute breakdowns of vehicle movements to review staff shift patterns and indicate workforce numbers. Annual monitoring of workforce home location. Reporting of patronage of bus services to identify unnecessary movement of empty buses. Monitoring of workforce movements to/from the accommodation campus

Category	Controls proposed by the Applicant	Monitoring proposed by the Applicant	Additional Controls requested by SCC	Additional Monitoring requested by SCC
Workers journeys to park and rides	Mode share targets as set out at Table 3.3 of the CWTP.	Count of Staff mode share and vehicle numbers one day per quarter as per Table 5.1 of the CWTP. Park and Ride site car park utilisation as per Table 5.1 of the CWTP. Car park occupancy as per Table 5.1 of the CWTP.	Total vehicle movements to the park and ride sites and if exceeded should constitute a breach.	To assist with validation of the information contained within the DMS and that obtained from the monitoring process which is to only occur on a single day of the month/quarter, in the absence of suitably agreed monitoring that goes beyond what is currently proposed, it is recommended that permanent ATCs are installed at the site access, on the main vehicular routes to the site, and at the accesses or on approach to the Park and Ride sites. This should include 15-minute breakdowns of vehicle movements to review staff shift patterns and indicate workforce numbers. Annual monitoring of workforce home location. Reporting of patronage of bus services to identify unnecessary movement of empty buses.
Visitor Trips	No Controls are currently proposed	No Monitoring is currently proposed	Visitor mode share to meet those figures assessed within the Transport Assessment. Visitor numbers to not exceed those assessed within the Transport Assessment. Requires a clear “transport” definition of visitor	Monitoring of the total number of visitors to the site including separating out visitors to the visitor centre and other visitors i.e. those individuals who work on site for a period which is not long enough for them to be defined as a worker. Monitoring of visitor mode share

Comments on the Transport Review Group Governance

27. Both the CTMP and CWTP refer to the governance proposal through the Transport Review Group (TRG). Whilst overall the proposed governance through the TRG is acceptable to SCC, SCC requests that (Paragraph 2.3.5 [REP2-054] and [REP-053]) should also allow for the relevant authorities to nominate a member of one of the other authorities to attend or to proxy vote on their behalf in case they are unable to attend. With regard to resolving disputes in the TRG (paragraph 3.2.3 [REP2-054] and [REP-053), SCC considers that as chair SCC should have a casting vote, notwithstanding the aim to reach a collective consensus within the group (this was set out in [REP2-192] the Council's Response to Examining Authority question TT.1.23).

28. Paragraph 2.6.4 of [REP2-054] refers to the Public Rights of Way Working Group. The remit and membership of this group is not clear nor are decision making or dispute resolution processes, and how that fits within TRG remit. Further clarification is required.

[REP2-054] CONSTRUCTION TRAFFIC MANAGEMENT PLAN (CTMP)

29. As set out in paras 17-24 above and particularly Table 2, SCC expects additional CTMP controls as well as a more comprehensive monitoring strategy than currently proposed. We comment in paragraph 25 above on the proposed Transport Review Group governance.

30. Table 3 provides additional detailed comments on [REP2-54], which SCC requests the Applicant to consider for the next version of the CTMP.

Table 3. Detailed comments on [REP2-054] Construction Traffic Management Plan (CTMP)

CTMP Para	Excerpt from [REP2-054] CTMP	SCC comments	Cross reference to other documents
Plate 3.2 and Plate 3.3	Maps: - Early Years HGV routes prior to two village bypass and Sizewell link road - Peak construction phase HGV routes once two village bypass and Sizewell link road are operational	The HGV route from A145 differs between Plate 3.2 and 3.3 and Plate 3.3 should be amended to match Plate 3.2 so that HGVs utilise the Beccles bypass and do not travel through Beccles town centre.	
Para 3.3.6	During the construction of the associated development sites, there would be the following average number of HGV two-way movements per day routing to/from each of the associated development sites: • Two village bypass – 120 two-way HGVs per day; • Sizewell link road – 200 two-way HGVs per day; • A12 / B1122 roundabout, Yoxford – 20 two-way HGVs per day; • Northern park and ride – 42 two-way HGVs per day; • Southern park and ride – 42 two-way HGVs per day; and • FMF – 42 two-way HGVs per day.	HGV movements to/from the Associated Development sites as average: Consideration needs to be given to whether this is a reasonable assessment of the worst case on this basis. This also needs to be considered in the context of the request for additional information raised in SCC's comments to ExQ1 TT.1.15 at DL3.	See D3 submission: SCC comments to EXQ1 DL2 submissions: TT.1.15

<table>
<tr>
<td>Table 3.3</td>
<td>
Table 3.3 – Frequency of temporary construction AIL movements
<table>
<tr><th></th><th>2017</th><th>2018</th><th>2019</th><th>2020</th></tr>
<tr><td>Number of days AIL movements occur</td><td>280</td><td>207</td><td>258</td><td>244</td></tr>
<tr><td>% days with AIL movements</td><td>77%</td><td>57%</td><td>70%</td><td>67%</td></tr>
<tr><td>Average AIL movements on days they occur</td><td>7</td><td>5</td><td>6</td><td>4</td></tr>
<tr><td>Average AIL movements per day (365 days)</td><td>6</td><td>3</td><td>4</td><td>3</td></tr>
<tr><td>Maximum AIL movements per day</td><td>23</td><td>20</td><td>26</td><td>17</td></tr>
<tr><td>Total</td><td>2,055</td><td>954</td><td>1,480</td><td>1,078</td></tr>
</table>
</td>
<td>The Council welcomes the provision of additional information on AIL movements; however, there is no quantification of the relative level of impact on the highway network of an AIL based on its width. It would be beneficial to have an understanding of the expected level of delay that an AIL might cause based on its width,</td>
<td>See SCC's comments in [REP1-045]</td>
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<tr>
<td>Para 4.4.6</td>
<td>Sundays and public holidays: There will be no Sizewell C HGV movements to/from the main development site from the wider highway network on Sundays or on public holidays.</td>
<td>The Applicant is to confirm that from this wording it can be assumed that there will be no exceptions and that works such as long duration concrete pours will be programmed to avoid these times.</td>
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<tr>
<td>Para 4.4.8</td>
<td>HGVs shuttling between LEEIE and the main development site are not included in the maximum daily HGV limits. Likewise, AIL movements to/from the main development site are excluded from the maximum daily limits on HGV movements and will be monitored separately.</td>
<td>This indicates that no limits are proposed for HGVs between the LEEIE and main development site.

SCC considers that controls are needed either on these movements specifically, or to ensure that there are no trips between the wider network and the LEEIE. This is to ensure that the LEEIE related movements do not result in additional HGV movements beyond the overall HGV caps.

If the HGVs travelling to/from the LEEIE are not included, the Applicant should confirm where vehicles will be based at the start and end of the working day. If the vehicles are to be based off-site (depots / homes etc), then these movements need to be included within the controls.</td>
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</tr>
</table>

Para 4.4.11	In order to stay within the assessed peak hour HGVs, Sizewell C HGV movements to/from the main development site will be subject to the following limits during the network peak hours: • During the early years, HGV movements to/from the main development site will be limited to 573 two-way HGVs during the weekday morning peak hour **(08:00 09:00)** and 34 two-way HGVs during the weekday evening peak hour **(17:00 18:00);** and • During the peak construction phase, once the Sizewell link road and two village bypass are available for use, HGV movements to/from the main development site will be limited to 634 two-way HGVs during the weekday morning peak hour **(08:00 09:00)** and 42 two-way HGVs during the weekday evening peak hour **(17:00 18:00);**	Peak hour controls should be extended to the adjacent hours of 07:00 to 08:00 and 16:00 to 17:00, which are also critical hours on the highway network.	See also SCC DL3 submission in response to ExQ1 – Question TT1.110
Para 4.4.13	Monday to Friday: During the early years, Sizewell C HGVs will be limited to arrive at the main development site between the hours of 07:15-21:00 and during the peak construction phase, once the Sizewell link road and two village bypass are in use, Sizewell C HGVs will be limited to arrive at the main development site between the hours of 07:00-21:00. The latest departure of Sizewell C HGVs from the main development site will be 23:00. Saturday: Sizewell C HGVs will be limited to arrive at the main development site between the hours of 08:00-13:00. The latest departure of Sizewell C HGVs from the main development site will be 14:00.	HGV timings, as proposed, are for arrival / departure and main site and do not control the times at which these vehicles can use the wider highway network. This is of some concern to SCC.	
Para 4.4.15	Effectively plan all HGV movements to/from the main development site in accordance with the construction programme to maximise construction and site efficiency	Paragraph 4.4.15 states DMS only applies to HGVs travelling to main site. Contradicted by 4.4.17 that states DMS will actively monitor number of HGV movements to the associated development sites. SCC considers that it should be for both.	

Para 4.4.17 (also Table 8.1)	The DMS will achieve the objectives by enabling the following to be undertaken: **(fourth bullet point)** • Actively monitor compliance with EURO VI standards for HGVs travelling to/from the main development site.	SCC welcomes the commitment to actively monitor compliance with Euro VI standards for HGVs travelling to/from the main development site this, but requests that the Euro emissions standards of all HGVs being used at the main development site and associated development sites should be monitored and recorded. Monthly reporting for three months followed by three monthly reporting is acceptable in principle. It is expected that an additional document will be submitted providing more detail on how HGV emissions will be monitored.	
Para 4.4.28	The purpose of the DMS-tracker is to monitor compliance with the HGV routes to/from the main development site. The DMS-tracker will utilise GPS technology to: • track HGVs on the HGV routes to/from the main development site; • provide live notifications to SZC Co. of HGVs not adhering to the HGV routes; • enable auditing to allow investigation into why any HGVs deviate from the HGV route • enable auditing of use of laybys on the local highway part of the HGV routes outside of the main development site 'HGV timing restrictions'; and • enable communication with drivers via sub-contractors/ hauliers in the event of an incident on the highway network requiring the activation of the TIMP (Doc Ref. 8.6(A)).	An additional bullet point should be included, to indicate that GPS technology will also be utilised to track HGV routes to/from the associated development sites.	
Para 4.4.30	**(second bullet)** Smaller supply chain partners may not have GPS technology fitted within their HGV fleet and therefore a smart phone app could be developed to allow integration with the DMS-tracker and for HGV movements to be tracked.	Rather than stating that such an app "could be developed", the CTMP should include a commitment to this mechanism for ensuring integration with the DMS-tracker.	

Paras 4.4.36/ 4.4.37	4.4.36 All HGV drivers will be required to adhere to Driver Rules on their journey to/from the main development site. The Driver Rules will be provided within an electronic Driver Handbook at the time of booking a delivery slot within the DMS. 4.4.37 HGVs arriving via the strategic road network (i.e. A14/A12), which will be the majority of HGVs, would be required to route via the freight management facility. All first time drivers to the main development site will be required to undertake an induction on arrival at the freight management facility to ensure that the driver understands the requirements they must adhere to when travelling to/from the main development site.	Paragraph 4.4.36 and 37 include details on 'driver induction and rules' and that drivers will receive an induction at the Freight Management Facility. Confirmation is sought on the process for this prior to the delivery of the Freight Management Facility, and for any drivers arriving from the north of the site after the delivery of the Freight Management Facility.	
Para 4.4.45	SZC Co. will seek to ensure that all HGVs will comply with the requirements of Euro VI emission standards where possible and Euro V standards (98/69/EC) as a minimum, unless otherwise agreed with the local authority.	The Council requests that this is revised to be consistent with the [REP2-056] Code of Construction Practice (CoCP) as follows: "*SZC Co. will seek to ensure that all HGVs will comply with the requirements of Euro VI emission standards where possible. The HGVs non-compliant with Euro VI will not exceed more than 8% of the total annual HGVs, with the balance of HGVs meeting Euro V standards (98/69/EC) as a minimum, unless otherwise agreed with the local authority."*	See CoCP [REP2-056]
Para 4.4.45	SZC Co. will seek to ensure that all HGVs will comply with the requirements of Euro VI emission standards where possible and Euro V standards (98/69/EC) as a minimum, unless otherwise agreed with the local authority	The document only refers to emission standards for HGVs, and not emission standards for buses, which should be added. SCC considers as a minimum the emissions class of buses should be equal or better than that required for HGVs. SCC seeks a commitment towards all park and ride buses being electric or low emission, and SCC recognises the Applicant's response to AQ.1.74 in REP2-100, which indicates they are in discussions with operators over a green bus fleet. SCC proposed this to be an aspiration for the development and we would seek it being included as a quantified aspiration in the Travel Plan. SCC requests to be kept informed of these discussions.	Refer also to Applicant's response to EXQ1 AQ1.74 [REP2-100]

Para 4.5.2	It is expected that the HGVs shuttling between the LEEIE and secondary site access would be a dedicated and regular fleet of HGVs. They would be on a fixed circa 1km route along Lover's Lane. These HGVs would not be tracked via the DMS-tracker but the number of HGV movements per day would be recorded via the DMS-booker and summarised within the transport monitoring reports issued to the TRG.	As noted above re para 2.7, Paragraph 4.5.2 should include a control on the total HGV movements between the Main Site and LEEIE so that a breach can be reported, or alternatively it should be confirmed that Table 8.1 covers movements between the main site and the LEEIE. Paragraph 4.5.3 should include confirmation that there will be no HGV movements to the LEEIE from the wider network to avoid potential routeing to the LEEIE and then onto the Main development site, which is not currently proposed to be controlled. Consideration also needs to be given to whether LGV movements to the LEEIE need to be monitored.	
Para 5.3.4/ Table 8.1	The number of HGV movements per day to/from the associated development sites during their construction and decommissioning would be recorded via the DMS-booker and summarised within the transport monitoring reports issued to the TRG.	The Council welcomes the inclusion of monitoring of the number of HGV movements to the AD sites as per Paragraph 5.3.4; however, we seek confirmation that the Table 8.1 covers movements to the AD sites and that on this basis if the figures were exceeded a breach would be identified, reported to the TRG and therefore be subject to compliance and enforcement. The monitoring should also include a cap on peak hour movements, as proposed for the main development site	
Para 5.3.7	During the construction / decommissioning of the associated development sites, there will be a need for temporary traffic management when the proposed junctions are being constructed and tied into the existing highway network. A regulatory order or notice will be required when it becomes necessary to prohibit, regulate or restrict traffic on a road as a consequence of the associated development construction works. Under the Road Traffic Regulation Act 1984, such changes to the way the permanent road network normally operates will require either a Temporary Traffic Regulation Order (TTRO) or a Temporary Suspension Request (TSR).	It is presumed the Applicant will require SCC as the Local Highway Authority to raise any traffic regulation orders required for traffic management, but can the applicant confirm this is the case. Guidance[1] recommends a minimum 12-week notice period for such restrictions. The Applicant should note that all major works will need to be co-ordinated with other utilities and Local Highway Authority works and early engagement is required to ensure the road space required by the applicant is available at the time required.	

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/43578/street-works-code-of-practice.pdf

Table 8.1	**Table 8.1: CTMP monitoring**	SCC considers the following elements should be added to Table 8.1: a) Table 8.1 should include confirmation for when monitoring for the project will start and should consider whether it will change, or short-term specific monitoring is required, as a result of infrastructure provision. b) Further confirmation is sought that HGV routes to/from the Associated Development sites will be monitored and will accord with the assessed routes where practicable (e.g. taking into consideration local contractors). c) As the GPS system will allow for monitoring of HGVs and AILs (paragraph 7.2.13) along the highway network, Table 8.1 should include continuous monitoring of journey times along the highway network (which is indicated at paragraph 9.5.9); this would provide a useful insight into additional delay along the highway network caused by the additional construction traffic, which may support assessment of future major schemes and help to inform the transport contingency fund, as indicated at paragraph 9.5.9. See Table 2 above for other required controls and monitoring.	

Monitoring criteria	Method of monitoring	Frequency of monitoring
Compliance with HGV movement limits and timings	DMS data and record of any breaches and action data	Continuous (data reported monthly for the first 3 months and once every 3 months thereafter).
Compliance with HGV routes	DMS data (based on GPS data) and details of any breaches and action data	
Average and maximum LGV movements per day to/from main development site	DMS data	
AIL movements to/from main development site by road per quarter and breakdown of loads unescorted, self-escorted and police escorted and any issues	DMS data and minutes from Community Safety Working Group	
HGV use of laybys on local highway network part of the HGV routes outside of HGV timing restrictions	DMS data (based on GPS data)	
Compliance with HGV emission standards	DMS data	
Compliance with FORS and CLOCS standards	DMS data	
Exceptional circumstances	Number of exceptional circumstances approved by the TRG per quarter	
Complaints / issues	Feedback from Community Safety Working Group, parish councils and general public via the Sizewell C complaints handling procedure.	

Para 6.1.1	There will be two types of LGVs associated with the construction phase of the Sizewell C Project: • LGV movements associated with the construction of the main development site; and • LGV movements associated with postal/courier deliveries to the main development site.	Paragraph 6.1.1 indicates that there are no LGV movements associated with the associated development sites. The Council seeks confirmation of this and associated monitoring	
Para 7.2.2	As set out in Section 3, there are two types of AILs for the Sizewell C Project; permanent equipment AILs and temporary construction AILs. It is proposed to provide a permanent beach landing facility (BLF) at the main development site to provide the ability to deliver the permanent equipment AILs by sea. In addition, SZC Co. **will seek to utilise spare capacity within the permanent BLF to deliver some of the heavier / larger temporary construction AILs by sea, if the programme allows.** Whilst it is intended to deliver as many of the heavy AILs as possible via the BLF, an allowance has been made for some VR1 and Special Order loads to arrive by road in order to provide a worst case basis for this CTMP (Doc Ref 8.7(A)).	Paragraph 7.2.2 sets out that the Applicant will 'seek to utilise spare capacity within the permanent BLF to deliver some of the construction AILs by sea. The Council would request further details on the process that would take place here to ensure that all available capacity is used where reasonable to do so.	
Para 7.2.7	SCC has confirmed that the highway structures on the AIL route from the A14 via the A12 and the AIL route from Lowestoft Port (Belvedere yard) via the A12 are capable of accommodating C&U and STGO AILs. Structural surveys would be required and approved by SCC prior to either of the routes being used by Special Order loads.	The statement by SCC is based on the current condition of highway structures. This is subject to change as structures are periodically reassessed.	
Para 7.2.14 and 7.2.15	The Norfolk and Suffolk Constabulary AIL guidance (Dec 2016) does not permit AILs to be moved on bank holiday weekends or periods when a major event has been planned, unless otherwise agreed with the Constabulary. In addition, the guidance does not permit the movement of AILs in the hours of darkness or in network peak hours of 07:30-09:00 and 16:30-18:00. SZC Co. proposes to adhere to the time limits set out in the Norfolk and Suffolk Constabulary AIL guidance (Dec 2016). AILs would be permitted to travel before 07:30 and after 18:00, subject to it being daylight, as well as between 09:00-16:30.	Can the Applicant provide assurance that the restriction of AILs to hours of daylight is an acceptable constraint particularly during the winter when the BLF will be unavailable.	

<table>
<tr>
<td>Para 7.2.10</td>
<td>For the largest AILs which would be police escorted, it is proposed for AILs to route through the centre of the proposed new roundabouts and street furniture to either be located outside of the AIL corridors within the roundabout or be dismountable. Should there be a need for AILs to route through the centre of the roundabouts, the haulage company would be required to make arrangements for the route to be prepared, including street temporarily removed, ahead of the AIL movement being made.</td>
<td>The Applicant should review the final sentence of paragraph 7.2.10 to determine whether it should be amended to ‘street furniture temporarily removed’?</td>
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<tr>
<td>7.2.15</td>
<td>SZC Co. proposes to adhere to the time limits set out in the Norfolk and Suffolk Constabulary AIL guidance (Dec 2016). AILs would be permitted to travel before 07:30 and after 18:00, subject to it being daylight, as well as between 09:00-16:30.</td>
<td>Paragraph 7.2.15 includes a proposal to adhere to Norfolk and Suffolk Constabulary time limits. Confirmation is sought from the Applicant, on how this is controlled.</td>
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<td>Table 9.1</td>
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<table>
<tr><th>Activity</th><th>Description</th><th>Responsibility</th><th>HGV</th><th>LGV</th><th>AIL</th></tr>
<tr><td>Create delivery request</td><td>To create a booking movement request to transport assets or materials to or from site using the DMS.</td><td>Tier 1 Contractor</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Review Delivery Request</td><td>To ensure a booking movement request is part of the Tier 1 contractor's plans and does not conflict with any priorities or constraints identified at the daily DMS Co-ordination meeting.</td><td>Delivery Co-ordinator</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Amend Delivery Request</td><td>To amend a booking movement request using the DMS to ensure it is part of the Tier 1 contractor's plans and does not conflict with any priorities or constraints identified at the daily DMS Coordination Meeting.</td><td>Tier 1 Contractor</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Cancel Delivery Request</td><td>To cancel a booking movement request for a delivery that has yet to be completed.</td><td>Tier 1 Contractor</td><td>✓</td><td>✓</td><td>✓</td></tr>
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<td>Table 9.1 (excerpt included on the right) makes reference to Tier 1 contractors. Confirmation is sought on how these are defined and whether other Tiers of contractor should be included within the Table.</td>
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<td>Para 9.5.15</td>
<td>Potential Contingent Effects will be raised at the quarterly TRG meetings, based on feedback from the community, parish councils, the Community Safety Working Group and TRG members. Only the agreed road links identified in Annex [X] to the Deed of Obligation (Doc Ref. 8.17(C)) can be put forward for potential Contingent Effects Fund.</td>
<td>The Council are concerned that there might be a limitation to the links, as indicated at paragraph 9.5.15, that mitigation can be provided on. Careful consideration will be need to be given as to the comprehensiveness of the proposed links in the relevant Annex, when it is made available, to ensure that risks are minimised that an unforeseen impact cannot be mitigated because it is not at a location within the Annex.</td>
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Para 9.5.15	During the construction phase, if the TRG agree that an investigation of a junction in Annex [X] of the Deed of Obligation (Doc Ref. 8.17(C)) is required to assess the effect of Sizewell C traffic on junction capacity / delay, a further 'driver delay' survey will be required to be undertaken at the junction for the network peak hours (08:00- 09:00 and 17:00-18:00). In addition, if the TRG agree that an investigation of a junction is required to assess the effect of Sizewell C traffic on junction capacity / delay, an ANPR survey will be undertaken at the junction for the peak periods (07:00-10:00 and 16:00-19:00) to determine the level of background traffic on each arm of the junction as well as the level of Sizewell C traffic routing through the junction	Surveys to investigate junction and link delay should not be restricted to the time stated in 9.5.19 if it is considered that SZC shift patterns or interpeak flows are having an adverse impact on junction behaviour.	

[REP2-055] CONSTRUCTION WORKER TRAVEL PLAN (CWTP)

31. As set out in **paragraphs 17-24** above and particularly **Table 2** above, SCC expects additional CWTP controls as well as a more comprehensive monitoring strategy than currently proposed. We comment in **paragraph 25** above on the proposed Transport Review Group governance.

Scope of the CWTP document

32. SCC has concerns that the scope of the CWTP (see table 1.1 [REP2-055]) is too limited.

33. The scope of the CWTP does not include the 730 construction workers for the associated development site. Consideration should be given to the management measures that can be put in place, particularly around monitoring car share or potentially within the bus strategy to reduce this impact.

34. The scope does not include staff at the Freight Management Facility; whilst SCC recognises the limited workforce at this location, there should be a commitment to promote car sharing to these employees. SCC would not expect these staff members to be included within the mode share targets but believe promotion of alternative modes should be undertaken.

35. The CWTP should include promotion of sustainable modes of travel to off-site facilities for non-work trips especially for workers living at the Accommodation Campus and LEEIE; this could be undertaken through the 'staff travel pack'.

36. SCC seeks assurance from the Applicant that the scope of the CWTP would also cover any potential 'unplanned' park and ride sites, as occurred at Hinkley Point C, should they occur at Sizewell C.

37. The CTWP does not contain any monitoring of visitors accessing the site directly or through park and rides or measures to encourage sustainable travel patterns.

38. As operational workers will have started working on site before the end of the construction phase there will be some overlap between the CWTP and the Operational Workers Plan. It is requested that the applicant considers how measures for operational staff can be embedded during this transitional phase.

Proposed measures

39. Whilst the measures proposed in the CWTP are welcome, SCC considers that there are shortcomings. A number of measures proposed in the CWTP are non-committal, with 'could' being used. SCC requests that greater commitment is included within the Travel Plan.

40. Although the CWTP included some initial measures and it is understood that, like all Travel Plans, it is a live document and subject to ongoing change, there are however some further measures which should be considered, at this stage, to encourage use of non-car modes which are not included in the CWTP such as:

- Interest free loans for rail ticket or cycle purchase.
- Cycle training for those living at the LEEIE and the accommodation campus who may not be able to ride a cycle but would like to for their journeys to and from the development. This could further encourage leisure trips to places such as Leiston by cycle which would have otherwise been carried out by car.
- Security marking of cycles as a safety measure.
- Provision of cycle equipment, such as inner tubes and pumps, in case of emergencies.
- Real Time Information boards at the Park and Rides, accommodation campus, LEEIE and the main development site to assist those waiting for buses to know when the next service will arrive and depart.
- Smart panels and / or notice boards at the LEEIE, accommodation campus, the Park and Ride sites and;
- the main development site providing up to date information on sustainable modes of transport, the CWTP and other measures being implemented.

Detailed comments

41. Table 4 provides additional detailed comments on [REP2-055] , which SCC requests the Applicant to consider for the next version of the CWMP.

Table 4. Detailed comments on [REP2-055]

Paragraph	Excerpt from [REP2-055] Construction Workforce Travel Plan (CWTP)	SCC comments	Ref to other documents
Para 3.4.11 and 4.2.6	In order to provide a robust assessment in the Consolidated Transport Assessment (Doc Ref. 8.5(B)), it was assumed that no workers would walk or cycle to the main development site beyond those workers living at the accommodation campus during peak construction. SZC Co. is committed to encouraging workers to travel as sustainably as practically possible and is providing a package of measures as part of the CWTP (Doc Ref 8.8(A)) to encourage walking and cycling. As such, the mode share assessment targets have been adjusted to provide mode share aim targets as summarised in Table 3.2 below. These targets are aspirational and increase the walk/cycle mode share so that it is not just based on workers living in the campus walking to work (as is the assumption in the mode assessment share) but assumes that other workers living nearby would make use of the proposed walk and cycle infrastructure improvements and walk or cycle to the main development site	The mode share targets, specifically the increase in walking and cycling (paras 3.4.12 and 3.4.14) will need investment in suitable facilities. These include secure cycle parking together with changing / storage facilities on the main and park and ride sites. The measures proposed in para 4.1.3 agree this in principle but greater detail will be required in the final CTWP to show that these are acceptable. In the LHA opinion the improvements listed in para 4.2.6 fall short of the necessary requirements in two important locations (REF LIR) • Abbey Road / Station Road. This is the most direct route for cyclists and pedestrian between the main site and Leiston town centre. The footways are generally narrow as is the road. Traffic is forecast to significantly increase on these roads, including buses serving local workers, during the construction phase. This route would be used by workers travelling to the main site entrance and those in the accommodation campus travelling to the town centre. • Eastbridge Road. The new bridleway ends at the northernmost junction with the existing BW19. North of this point the road is narrow, with no footway and limited verges constrained by hedges. No improvements have been proposed for either of these two locations.	

<table>
<tr>
<td>Table 3.2</td>
<td>
Table 3.2: Main development site mode share aim targets
<table>
<tr><th>Final Mode of Travel to Main Development Site</th><th>Early Years Workforce Split</th><th>Early Years Mode Share</th><th>Peak Construction Workforce Split</th><th>Peak Construction Mode Share</th></tr>
<tr><td>Walk/cycle</td><td>30</td><td>2%</td><td>2,544</td><td>30%</td></tr>
<tr><td>Car driver</td><td>210</td><td>14%</td><td>933</td><td>11%</td></tr>
<tr><td>Car passenger</td><td>75</td><td>5%</td><td>509</td><td>6%</td></tr>
<tr><td>Direct bus</td><td>585</td><td>39%</td><td>1,866</td><td>22%</td></tr>
<tr><td>Park and ride bus/rail</td><td>600</td><td>40%</td><td>2,629</td><td>31%</td></tr>
<tr><td>Total</td><td>1,500</td><td>100%</td><td>8,480</td><td>100%</td></tr>
</table>
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<td>The Council welcomes the ambitions for aspirational targets as set out at Table 3.2.</td>
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<td>Para 4.2.8</td>
<td>In addition, the following cycle parking spaces are proposed at the associated development sites:
• 120 cycle parking spaces at the accommodation campus;
• 20 cycle parking spaces at the northern park and ride facility; and
• 20 cycle parking spaces at the southern park and ride facility.</td>
<td>The proposed provision for Park and Rides is below Suffolk Parking Guidance; evidence needs to be provided by the Applicant whether the proposed cycle parking provision would cater for the predicted demand. It would be useful for the Applicant to compare it to the Mode Share aim targets at Table 2.4 and the currently forecast population within reasonable cyclable distance of each facility to indicate whether it is a reasonable starting provision and would cater for these levels of demand. As an example, the target is for 30 workers to walk or cycle to the southern park and ride, does this represent the population forecast by the gravity model to be within cyclable distance and on this basis will the proposed facilities support this level of cycling? The proposed cycle parking at the accommodation campus should meet Suffolk Parking Guidance for C1 Hotel use.</td>
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<tr>
<td>Para 4.3.6</td>
<td>A number of direct bus services have been assessed in the Consolidated Transport Assessment (Doc Ref. 8.5(B)), based on the gravity model and the forecast distribution of construction workers. The direct bus timetables and routes will be subject to ongoing refinement during the construction phase to adapt to the number and distribution of the workforce. Prior to a new direct bus service being implemented by SZC Co., the transport co-ordinator will submit information to the TRG in terms of the proposed route, bus stops and timetable for their approval by the TRG. Likewise, any refinements to direct bus services once they are operational would also need to be approved by the TRG.</td>
<td>The Council welcomes the provision that new direct bus routes, stops and timetables would be approved by the TRG. This should also include additional park and ride.
While supportive of the use of buses, concerns remain that, if not well organised, a significant number of trips can be created by empty buses moving between the site and park and rides.</td>
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Para 4.3.12	The following principles will be adopted for the park and ride facilities: **(first bullet)** Any worker living within 800 metres (m) of a park and ride facility will be expected to walk or cycle to that park and ride facility and, except in exceptional circumstances (e.g. ill health or disability), will not be issued with a parking permit	Further clarity is required regarding all principles listed in paragraph 4.3.12 are applicable to all park and ride sites (i.e. LEEIE park and ride and northern park and ride sites), and whether it also applies to the main site car park. This is to be considered specifically with regard to the requirement that workers within 800m should walk or cycle. In the case of the main site, all of Leiston is over 800m from the main development site. It is presumed but not entirely clear that in paras 4.7.4 and 4.8.1 if 'living in Leiston' refers to those workers residing within the parish boundaries. For the northern park and ride all of Yoxford and the majority of Darsham are further than 800m from the park and ride. Similarly, all or Wickham Market, Campsea Ash and Marlesford are further than 800m from the southern park and ride. Thus, few workers will be ineligible for permits to the park and ride car park. This should be further reviewed.	
Para 4.5.2	The proposed motorcycle parking provision at the park and ride sites is 80 spaces at the northern park and ride site and 80 spaces at the southern park and ride site	The proposed motorcycle parking provision exceeds Suffolk Parking Guidance Third Edition[2] and is considered acceptable although, no details appear to be provided for the site accommodation campus. The motorcycle parking facilities should be designed in accordance with Suffolk Parking Guidance.	

[2] https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf

Para 4.7.15	The following electric vehicle charging spaces are proposed at the main development site (construction phase) and associated development sites: • 1,000 car parking spaces are proposed at the main development site, of which 5% are proposed to have electric vehicle charging points and 5% with passive electric vehicle provision; • 600 car parking spaces are proposed at the temporary park and ride facility at the LEEIE, of which 5% are proposed to have electric vehicle charging points and 5% with passive electric vehicle provision; • 1,250 car parking spaces are proposed at each of the northern and southern park and ride facilities, of which 5% are proposed to have electric vehicle charging points and 5% passive electric vehicle provision; • 12 car parking spaces for staff and visitors are proposed at the freight management facility, of which 5% to be equipped with electric vehicle charging points and 5% passive electric vehicle provision.	The proposals for each site are for 5% to have charging points and 5% to have passive provision, which SCC considers to be too low. Suffolk Parking Guidance identifies for employment that 20% of all parking should include charging points with a further 20% with the require infrastructure, which would be appropriate for the park and ride sites and main site. For the accommodation campus the Suffolk Parking Guidance identifies 25% of spaces to have charging points and 25% to have the infrastructure in place for future connectivity for C1 hotel use.	
Para 4.10.1	The requirement for compliance with the CWTP (Doc Ref 8.8(A)) is proposed to be imposed as a condition of contract on all contractors appointed to work on the Sizewell C Project. These requirements effectively limit the modes by which a construction worker would travel to and from the main development site to the following options: • car travel for the limited number of workers allocated a permit for one of the 1,000 on-site parking spaces, or are car-sharing with one of those workers; • walking or cycling for those workers who live sufficiently close to the main development site and are physically able to travel by this mode; • walking for those workers resident at the accommodation campus; and • park and ride or direct buses for all other workers not in one of the above categories	SCC considers that paragraph 4.10.1 should also include 'walking and cycling for those workers who live sufficiently close to the park and ride sites'.	

Table 5.1	**Table 5.1: CWTP monitoring** | Monitoring criteria	Method of monitoring	Frequency of monitoring
---	---	---
Mode share targets for construction workers travel to main development site (assessed and aim targets)	Observed count at the car park access points, including car occupancy, and SZC construction worker security pass/bus pass data	1 weekday, once per month for the first 3 months and once per quarter thereafter
Mode share targets for construction workers travel to park and ride sites (assessed and aim targets)	Observed count at site access points, including car occupancy	1 weekday, once per month for the first 3 months and once per quarter thereafter
Cycle and motorcycle parking utilisation	Observed count of parking spaces used, total parking spaces provided and % utilisation.	1 weekday, once per month for the first 3 months and once per quarter thereafter
Patronage of each bus service	Construction worker security pass/bus pass data	Average over a week, once per month for the first 3 months and once per quarter thereafter
Profile of bus arrivals and departures to/from the main development site, which will also provide the TRG with an understanding of the shift pattern.	GPS tracking data on buses	Average over a week, once per month for the first 3 months and once per quarter thereafter
Main development site, LEEIE (early years), southern and northern park and ride car park utilisation	Observed count of parking spaces used, total parking spaces provided and % utilisation.	1 weekday, once per month for the first 3 months and once per quarter thereafter
Fly parking monitoring - breakdown of SZC Co. worker parking legitimately, SZC Co. worker fly parking, non-SZC Co. worker parking and action taken	SZC Co. helpline and investigation by fly parking team	Continuous (data reported monthly for the first 3 months and thereafter on a quarterly basis)
Mode share and construction worker attitude to travel plan measures	Annual staff travel survey	Annual | SCC considers that the following needs to be amended/added to the CWTP monitoring table: a) When reporting the patronage of each bus service, this should include details on specific bus movements, so that any empty or local occupancy buses can be identified with the aim of reducing impacts on the local highway network. b) Add a commitment to monitor staff shift patterns (or arrival and departures patterns at the main site) to identify the potential for unassessed impacts, particularly with regards to junction capacity, but potentially with regards to the ES reference hour. c) The observed count should include a 15-minute breakdown of arrival and departure patterns in order to identify the potential for unassessed impacts resulting as a result of shift patterns not reflecting those assessed. d) The table should include an annual survey of workforce home data to determine the origin and to be reviewed against the gravity model to potentially inform unforeseen impacts. e) To enable the monitoring to be meaningful, profiles of workers and the modal split during the construction phase will be needed to compare against the data collected and confirm that travel plan targets are on a trajectory in line with the assumptions made and that the travel plan targets will be achieved. Much of the data can be collected automatically without the need for survey (e.g. bus use) rather than monthly surveys that are likely to be less accurate being as sample on a specific date. f) SCC considers that the table needs to include surveys or monitoring of visitors working at Sizewell C. These trips may be a significant proportion of those travelling to and from Sizewell C.	See also **Table 2 in this document** above

		g) The movement of empty buses around the network is a concern for SCC and monitoring of these should also be undertaken. h) For ease of analysis review, once anonymised, the data supporting the Transport monitoring reports should be provided to the TRG in excel format (e.g. csv) **See Table 2 in this document** above for other required monitoring.	
Para 5.3.1	SZC Co. will monitor progress against the mode share targets set out in this CWTP (Doc Ref 8.8(A)). Mode shares will be reported to the TRG and the review by the TRG will consider whether: • SZC Co. is meeting or on track to meet the mode share targets and no amendments to the Action Plan or mode share targets are required; • SZC Co. is not on track to meet the mode share targets and additional actions are needed; • SZC Co. is not on track to meet the mode share targets but no further action should be taken either because there are remedial actions already in train or because any reasons for divergence from the mode share split are reasonable and legitimate.	This section should include reference to monitoring exceedances of assessed vehicle trips at the main site and park and ride sites as a breach. This will help ensure that should workforce numbers exceed those assessed, that they are transported by direct bus rather than private car.	See also **Table 2 in this document** above
Para 6.5.18	Decisions on drawing down funding from Contingent Effects Fund 2 would be made based on the following types of evidence, to be agreed with the TRG: (fourth bullet) • Sizewell C HGV GPS data to provide evidence of the effects on journey times along the HGV routes as an indication of the journey time effect on general traffic;	SCC welcomes the inclusion of HGV journey time data based on the GPS information being provided to help inform mitigation by identifying driver delay. SCC considers that this should also include journey time from the AILs as this will again help better inform future scheme assessment as well as impacts on the highway network.	

Appendix 1A		Appendix1A refers to the Staff Travel Pack; this should be reviewed by SCC prior to issue to staff Appendix 1A should include any medium and long-term measures as well as those actions that are to be undertaken prior to construction. Appendix 1A should include confirmation of who is responsible for undertaking each action.	

[REP2-053] TRAFFIC INCIDENT MANAGEMENT PLAN (TIMP)

42. Table 5 provides detailed comments on [REP2-053], which SCC requests the Applicant to consider for the next version of the TIMP.

43. Please note that the comments below are based on the Sizewell Link Road becoming a public highway during the construction of Sizewell C, as proposed by the Applicant in the submitted DCO, and notwithstanding SCC's preference to have the Sizewell Link Road removed after construction which may result in the Sizewell Link Road not becoming a public highway. If this is not the case, and the Sizewell Link Road does not become a public highway, it may be possible to stack HGVs on this road during an incident. The wording in 4.2.3, 4.3.4 and 4.3.9 would need revision to 'in the event of an incident on the public highway or the SLR'.

Table 5. Detailed comments on [REP2-053]

Para	Excerpt from [REP2-053] Traffic Incident Management Plan (TIMP)	SCC comments	Ref to other documents
Para 1.2.1 and 4.3.21	1.2.1 This TIMP (Doc Ref. 8.6(A)) sets out the management of the Sizewell C construction traffic during an event or incident occurring on either the heavy goods vehicle (HGV) or park and ride bus routes to the main development site. 4.3.21 SZC Co. will establish an appropriate communications protocol for workers, bus drivers transporting construction workers and HGV drivers.	While the TIMP is aimed specifically at the management of HGV traffic (as in para 1.21) there would be benefits to other construction related traffic such as the service buses, LGVs and workers travelling to the site or associated developments if the real time information can be made available to them (as in 4.3.21).	
Para 2.2.4	In the event of an incident on the strategic road network or local road network the role of Highways England or SCC (depending on road hierarchy) is generally to: • Initiate traffic management strategies on incident impacted facilities. • Protect the incident scene. • Provide traffic control. • Assist motorists with disabled vehicles. • Provide traveller information. • Determine road repair needs. • Establish and operate alternative diversionary routes. • Repair highway infrastructure	Highway Authorities duties are proscribed in the Highway Act 1980 s41 and Part 2 of the Traffic Management Act 2004. The former relates primarily to maintenance of the highway maintainable at public expense and the latter the network management duties. The list in this paragraph are, with the exception of repairing the road, not statutory duties	
Para 3.4.2	In relation to the TIMP (Doc Ref 8.6(A)), the delivery co-ordinator and the delivery team will be responsible for: • Holding Sizewell C buses and HGVs off the highway network until notified by Suffolk Constabulary to resume normal operations • collating monitoring data for the transport monitoring reports.	See SCC comments about wider dissemination of traffic information, in response to para 1.21 of the TIMP	

Para 3.5.4	The parish councils within the Sizewell C study area (…)	The CWTP should include details of parishes within study area. SCC will review this once made available.	
Plate 4.1/4.2	Maps: Early Years HGV routes prior to two village bypass and Sizewell link road Peak construction phase HGV routes once two village bypass and Sizewell link road are operational	At Plate 4.1 and Plate 4.2 which indicate HGV routes, the HGV route from A145 differs between Plate 4.1 and 4.2 and Plate 4.2 should be amended to match Plate 4.1 so that HGVs utilise the Beccles bypass.	
Para 5.1.4	Planned Incidents/events identified include: • Closure of Orwell bridge due to high winds or planned maintenance; • Other planned highway maintenance; • Closure of the Port of Felixstowe due to inclement weather and implementation of Operation Stack; • Latitude Festival.	Consideration needs to be given to whether the TIMP should be able to be amended to reflect highway improvement works. Most notably the potential exists for highway works at the A14 / A12 Seven Hills junction and it may be beneficial for the route to be amended during construction so that HGVs do not need to travel to the Freight Management Facility.	
Para 4.3.17	Any Sizewell C HGVs and buses not held at one of the holding locations would be required to route along the designated HGV and bus routes unless temporarily instructed not to by the highway authority (Highways England or SCC) or Suffolk Constabulary and instructed to use diversionary routes.	Diversion routes for the A12 north of Ipswich are by necessity on local roads, generally B class roads, which are not designed for large volumes of traffic or HGVs. Many diversion routes pass through constrained local communities and are of considerable length. The majority are unsuitable for the volumes of traffic proposed for SZC.	
Para 5.2.2	For planned closures of Orwell Bridge, it is proposed that Highways England would notify SZC Co. in advance. In accordance with the arrangements SZC Co. proposes to put in place, as set out in section 4, SZC Co. would then notify Sizewell C contractors and liaise with Highways England and SCC in relation to appropriate diversionary routes	Closure of the Orwell Bridge necessitates diversion of traffic through Ipswich. This creates significant congestion within the town. Diversion of Sizewell C traffic on these routes would be unacceptable to SCC. The Port of Felixstowe delivery management system stops vehicles at source when closure of the Orwell Bridge is forecast and SCC strongly recommends that the Applicant follow this lead.	

Para 5.3.2	The DMS would support incident management in the following ways: • by controlling the number and frequency of HGVs on the approved HGV routes; • by holding HGVs at the control points (freight management facility, main development site and TIMA) • by providing incident messages and instructions maintained by SZC Co. (based on information provided by Suffolk Constabulary, highway authorities, site teams, or delivery drivers); • by contractors cascading information to their delivery drivers via the DMS and haulage companies; • by having a delivery management team based at the main development site to act as contact point for contractors. This team will help manage and coordinate SZC Co.'s response to an incident in the area; • by the Sizewell C Delivery Coordinator having the ability to amend or cancel bookings in the DMS at any time and all changes automatically being notified to contractors delivering to the Sizewell C. The appointment of the Delivery Coordinator during construction will be secured through the Deed of Obligation (Doc Ref. 8.17(C))).	For this process for unplanned incidents, can the applicant confirm whether in the event of significant delays will set down areas be provided within the contingency plans where drivers are able to wait should they be at risk of exceeding their driving hours.	
Para 5.2.4	It is expected that planned maintenance work on the A12, B1122, and other roads carrying appreciable volumes of Sizewell C traffic, could be restricted to overnight and/or weekend. Liaison with SCC will need to be undertaken to understand the planned maintenance programme and potential impact on the Sizewell C Project.	Major planned maintenance of the A12 such as resurfacing is generally programmed overnight but many routine and cyclic maintenance activities are planned in the daytime interpeak period. While SCC is prepared to consider undertaking these activities at night or during the weekend this will involve additional costs for the authority.	
General		Whilst a process exists for managing traffic from the south, can the Applicant confirm whether a location has been identified for managing vehicles from the north in the event of an incident (e.g. the northern park and ride).	

[REP2-035] RIGHTS OF WAY AND ACCESS STRATEGY (VOLUME 2, CHAPTER 15 APPENDIX 15I OF THE ENVIRONMENTAL STATEMENT)

44. SCC has reviewed the updated Rights of Way and Access Strategy and seeks a number of clarifications and changes.

45. The description of the PROW impacts of the Beach Landing Facilities (BLFs) needs some clarification. It is stated (in para 1.2.10) that the deck of the permanent BLF will only be present during periods of BLF use, but this is not clearly defined as to whether it will be present between April and October when AILs are being unloaded. The document only provides (in para 1.2.11) the clearance of the temporary BLF (at 3.7m), but not for the permanent BLF. Clarification is required whether it would be the same clearance for the permanent BLF, i.e. sufficient to allow use by equestrians.

46. The inland diversion route for the Coast Path (described in paras 1.2.12, 1.2.15 and 1.2.22) requires users to walk, cycle or ride on Eastbridge Road between the northern end of Bridleway 19, where the new bridleway ends, and Eastbridge, where pedestrian access to return to the coast path can be gained using the footpath to Minsmere Sluice. This section of Eastbridge Road is narrow, constrained by hedges and has little if any verge. Thus it is not suitable for use by pedestrians, cyclists or equestrians. As stated in the Local Impact Report [REP1-045] (para 17.120 and Table 15), SCC also expects for this section the provision of an appropriate safe off-road footpath, secured by obligation.

47. SCC requests that some or all of the permissive paths within Kenton Hills (referred to in paras 1.2.27, 1.2.31 and 1.2.40), which also form part of the Sandlings Walk, are adopted as public footpaths or bridleways to provide a legacy benefit for the general public. This preference has been stated in the Local Impact Report [REP1-045] (para 17.123).

48. Paragraph 1.2.33 to 1.2.35 relate to the Coast Path. In the Local Impact Report [REP1-045], our concern of the proposed location of the Coast Path public right of way post construction has been highlighted; as an excerpt: “The Councils remain concerned that the proposed design places the public footpath, the England Coast Path and the footpath corridor seaward of its current location, and further seaward from the original application. This could leave the public footpath more vulnerable to erosion from coastal processes and hence severance. The regular need to recharge the soft defence could affect users both physically if closures are required during these works and in terms of amenity and tranquillity.“ The section of the Local Impact Report concludes with “The Councils maintain their objection to re-locating the

permanent public footpath where it will be expected to erode, creating a management and legal liability for SCC." Our expressed preference remains that the coastal public right of way should be located on top of the new hard coastal sea defence.

49. SCC notes that the Coast Path and Sandlings Path will be affected by potential construction of raising the heights of the sea defence and associated hard defences i.e. rock armour (1.2.35). The SCC Public Rights of Way team should be involved at an early stage of the design to ensure temporary and permanent impacts of this construction are minimised. The Applicant is requested to clarify the legal process by which rights of way on the foreshore will be temporarily closed and diverted as it appears that the details of diversion routes are likely to change during construction.

[REP2-007] UPDATED ACCESS AND RIGHTS OF WAY PLANS - REVISION 4.0

50. Plan SZC-SZ0204-XX-000-DRW-100345 (Sheet 6 of 28 of the main development site and rail rights of plans [REP2-007]) shows an indicative alignment of the permanent public right of way along the seafront of the power station. It is difficult to see from this plan where the proposed permanent highway (footpath) is in relation to the new sea defences, and whether it is located on top of or at the foot of the hard coastal sea defence. Other diagrams (for example, cross sections in Appendix A.4 of Sizewell C Coastal Defences Design Report [REP2-116]) indicate that the proposed coast path route is located at the foot of the hard sea defence, which suggests that it will be increasingly at risk of erosion. As stated in paragraph 46, SCC requests that the coastal public right of way should be located on top of the new hard coastal sea defence, in order for it not being at risk of erosion. SCC considers that there should be greater clarity in a plan to be approved as to the location of the footpath in relation to the hard sea defence, or subject to subsequent approval by SCC under Requirement 5.

51. The annotation to Plan SZC-SZ0204-XX-000-DRW-100345 states that "The precise alignment of the permanent footpath commencing at PCF1/4 and terminating at PCF1/5 will accord with the layout and scale details of the hard coastal defence feature to be submitted and approved pursuant to Requirement 12B." The approval of the final location of the public right of way is part of Requirement 5 [REP2-015]: "(1) No development of any new or diverted public right over way listed in Schedule 11 may be commenced until a footpath implementation plan for that public right of way has been submitted to and approved by Suffolk County Council." Schedule 11 lists specifically the "New

highway (footpath) between points PCF1/4 and PCF1/5". The annotation of Plan SZC-SZ0204-XX-000-DRW-100345 should be updated to reflect that the footpath location is approved pursuant to Requirement 5.

[REP2-033] OUTLINE DRAINAGE STRATEGY - REVISION 2.0

52. The Applicant submitted an update to the Outline Drainage Strategy at Deadline 2. However, we understand that further details on surface water drainage strategies for all the proposed sites are going to be submitted at Deadline 3 and/or 4. As such, we will not make detailed comments on the outline strategy until these submissions have been made and we have had time to review the content in detail.

[REP2-131] SECOND NOTIFICATION OF PROPOSED PROJECT CHANGES

53. SCC notes the Second Notification of Proposed Project Changes, for which the Applicant has since commenced undertaking a public consultation. An initial review of the proposed changes indicates that SCC does not have any major concerns about the proposed changes. At this point, it wishes to make short initial comments to two aspects of the proposed changes:

- With regard to the revised Pretty Road bridge proposal to enable use by motor vehicles, SCC would not object to these modified proposals. SCC's **comments to ExQ TT1.96 in our DL3 submission** provide some further considerations on these proposals.
- With regard to the revised surface water drainage proposals for the western end of the Sizewell Link Road (headed in [REP2-131} "Gravity Drainage Solution"), SCC would support any solution that supports gravity drainage at this location.

54. SCC will provide detailed comments directly to the Applicant in response to their consultation.