ID Number: 20026012

The Sizewell C Project, Ref. EN010012

Suffolk County Council comments on responses to ExA's Written Questions (ExQ1)

Suffolk County Council Registration ID Number: 20026012

Deadline 3 **24 June 2021**

Preamble

A significant amount of additional information has been submitted at Deadline 2 by the Applicant and Interested Parties. This included a large amount of responses to ExQ1. Whilst Suffolk County Council (SCC) has attempted to comment on as many relevant questions as reasonably possible; due to the amount of information and to ensure an informed response, SCC was not able to review all responses. The comments in this document are focussed on the responses provided by the Applicant [REP2-100], but also touches on responses by Network Rail [REP2-157] and by East Suffolk Council [REP2-176].

We wish to refer the Examining Authority also to our original responses to ExQ1 [REP2-192]

For each question, for ease of reference, we are including the question and the original response from the Applicant / relevant Interested Party, before providing SCC's comments.

Table of content of question topics covered

1. General and Cross-topic		
G.1.34	ExQ for the Applicant	Permanent SSSI Crossing A number of IP's have referred to a crossing option of a three span bridge, that was considered at Stage 2 consultation. This is outlined in Appendix D7 [APP-072]. In Table 7.2 of that document it sets out the relative merits of a number of options including a three span bridge. This three span bridge option is stated to have the least land take from the SSSI and also has the least width of 35.5m, which includes the temporary bridge that would be ultimately removed. The current proposal has a final footprint width of 70m. This width is greater than any option in that previous consultation and presumably has a higher land take from the SSSI especially as there would be no removal of temporary incursion into the SSSI. Provide: (i) Explanation in detail why the three span bridge approach in the Stage 2 consultation is no longer being proposed, given the implications for the SSSI set out in Table 7.2 and Table 7.3; and (ii) The estimated land take of the current single span bridge proposal.
	Applicant Response	(i) The triple-span bridge is not proposed because of its substantial effect on the construction programme. This is because it would delay the movement of bulk earthworks from the deep excavation to the Temporary Construction Area. The 6-12 month programme saving benefits of the proposed SSSI Crossing are considered to outweigh the impact caused by the permanent loss of a small additional area of the Sizewell Marshes SSSI. The triple span bridge is estimated to take 35 weeks to provide its first crossing (a shortterm modular bridge), compared with 17 weeks for the proposed solution. During the 18-week delay associated with the triple span bridge, no bulk earthworks at all can be transported to the Temporary Construction Area. The second milestone under the triple-span bridge option would be when the temporary triple-span bridge is complete next to the modular bridge. This is when full-size haul vehicles can use the SSSI Crossing. It would take approximately 30 weeks longer in total to reach the point where full-size haul vehicles, which have a much greater carrying capacity, can use the triple span bridge compared with the proposed solution. The final milestone is when the SSSI Crossing is complete. The proposed solution can be constructed in a total of approximately 55 weeks, whereas the triple-span bridge option would take more than twice as long (approximately 108 weeks in total). Whilst full-size vehicles can use the crossing from the second milestone, the capacity for bulk earthworks movements is substantially constrained because the temporary triple-span

		bridge would need to be shared with other construction-related vehicles whilst the permanent triplespan bridge is under construction. Overall, the effect of constraints to bulk earthworks movements that would be caused by implementing the triple span bridge option is a 6-12 month delay to the overall construction programme of SZC. (ii) The permanent SSSI land-take for the proposed SSSI Crossing, as defined by the footprint of the embankments located at either end, is approximately 0.21ha. The permanent SSSI land-take for the triple span bridge option, as defined by the footprint of its (smaller) embankments and areas of permanent ground improvement required for the temporary bridge, is approximately 0.19ha. This area of ground improvement is included in the permanent land take even though the temporary bridge would be removed, because the works would have been so extensive that the land could never have feasibly become SSSI status again. Works would have included substantive piling, overlaid with a reinforced granular stone load transfer platform. The platform would have needed to extend up to the central span to create a working area for construction activity. Further to the above, SZC Co's response to question G.1.32 states that in response to ecological concerns raised by stakeholders, SZC Co. now propose to constrain the width of the bridge to approximately 15m once the power station has been built. This is narrower than the width of the triple span bridge, which would have been approximately 18.5m. Narrowing the proposed bridge post-construction substantially reduces long-term ecological impacts on the SSSI, which are mainly associated with shading.
	SCC Comment	**The difference in time for delivery of the two approaches should be tested more thoroughly if this is to be seen as the major driver for the use of a scheme which SCC and other parties see as more damaging environmentally.** **The Applicant suggests in their answer that the difference between the SSSI land take by a bridge (0.19ha) and the causeway (0.21ha) is only 0.02ha greater. This appears counter-intuitive, given the much wider splay that the embankments of a causeway would have than a bridge. Further evidence on this would be appropriate.** **There is a proposal to reduce the causeway bridge width in operational phase. The Applicant should confirm how it can be assured that will be achieved.**

G.1.46	ExQ to Applicant, Network Rail	Green Rail Route and Land East of Eastlands Industrial Estate (LEEIE) (i) In the event the Saxmundham to Leiston branch line is modified as proposed and both the LEEIE and Green Rail Route are established could they both be operational at the same time? (ii) Please explain whether this is possible and if not what would be in place to prevent it? (iii) Has the ES assessed the possibility of both operating together?
	Applicant Response	(i) Based on the current designs, it would be technically possible to operate both the Green Rail Route and the LEEIE at the same time. (ii) The design is being optimised for sequential operation of the LEEIE, and then the Green Rail Route. For example, the signalling design is being developed to enable access to the LEEIE, and then the Green Rail Route. While both pieces of infrastructure could theoretically be operated simultaneously, this would require a specifically agreed operational process. Any simultaneous use of the infrastructure in the course of normal operation has not been identified as a design requirement. (iii) No
	Network Rail Response	The applicant has entered into a BAPA arrangement with Network Rail. As part of this undertaking a full review of designs and interoperability will be undertaken. At this stage we are unable to provide comments on the designs proposed. N.B Green Rail Route and Land East of Eastlands Industrial Estate (LEEIE) is being developed by EDF.
	SCC Comment	**There is concern that the work being undertaken by the Applicant could result in the project delivery being fragmented. SCC needs to see a full programme of work on both the East Suffolk Line and Leiston Branch Line with information on how both pieces of work will be aligned and delivered in a way that is not disruptive to passenger rail and rail freight services.**
G.1.51	ExQ to Applicant, Network Rail	Freight Trains (i) Please advise of the stages to go through to confirm that freight trains could begin to deliver materials to both Land East of the Eastlands Industrial Estate (LEEIE) and the Main Development Site (MDS) using the Green Rail Route. (ii) Please set out what you consider to be a realistic time frame for the delivery and facilitation of both options in the event the DCO were to be granted.

	Applicant Response	(i) Project Stages (common to all railway projects): In addition to approvals necessary through the DCO process, the SZC rail projects are being developed and delivered in line with Network Rail (NWR) standards NR/L1/INI/PM/GRIP/100 (Governance for Railway Investment Projects) and NR/L2/INl/02009 (Engineering Management for Projects). This includes the Green Rail Route and LEEIE sections which, as temporary sections of track, will remain the responsibility of SZC Co. throughout the period of their operational use. As such there is no obligation on SZC Co. to comply with NWR standards; however, compliance with these standards demonstrates the "best practice" approach being adopted by SZC Co. In summary, the steps are: • GRIP 3 – Single Option Selection • GRIP 4 – Single Option Development to achieve Approval in Principle (AiP) by NWR of the design. This confirms compliance with the appropriate technical standards. • GRIP 5 – Detailed Design, based on AiP design, with inter-disciplinary check and reviews and independent design checks carried out. Acceptance of the detailed design by suitably qualified and experienced NWR and SZC engineers. Designs progressed to "Approved for Construction" status. • GRIP 6 – Construction of the new and upgrade infrastructure works associated with the project, in line with the accepted design and specification for the work. Testing & Commissioning activities to confirm operation to the operator and maintainer prior to bringing into use. • GRIP 7 – Handover, transferring responsibility for the new and upgraded assets to the operator and maintainer, likely to be NWR for the existing branch line; and the appointed Freight Operating Company (FOC) for the Green Rail Route and LEEIE. Compliance with the NWR GRIP and Engineering Management standards will ensure that, once commissioned, the new and upgraded rail infrastructure will be capable of use for operating the rail services required for construction of SZC. There are, however, additional elements which need to be in place prior to the commencement of these services. These include the following: • Freight Customer Track Access Contract, between NWR and SZC Co. This sets out the terms on which SZC Co. is entitled to operate services. Where SZC Co. requires services to be operated, it issues a "drawdown notice" to NWR and the FOC. NWR and the FOC then enter into an access contract as below. This contract requires the approval of the Office of Road and Rail (ORR). • Freight Track Access contract, between NWR and the FOC. This is required to secure the train paths to allow the proposed SZC freight trains to operate on the national railway network. SZC Co.'s access

		rights would be implemented through agreement of the railway timetable where the number and timing of train movements for SZC Co's freight trains across the railway network to and from SZC site. This contract requires ORR approval. • Connection Agreement, between NWR and SZC Co. to secure approval to make the proposed temporary rail connections between the Saxmundham to Leiston branch line and the development site. This agreement requires ORR approval • Asset Protection legal agreements or implementation agreements, between NWR and SZC Co., under which SZC Co. secure the services of NWR to support the development and / or delivery of the necessary infrastructure changes. A schedule of these agreements is set out in the NWR / SZC Co. Statement of Common Ground. • Framework Agreement / Protective Provisions between NWR and SZC Co, as described in SZC Co.'s response to question CA1.61 • Land Access licences or agreements between NWR and SZC Co., to secure the necessary access to NWR property to enable the infrastructure work to be carried out. • Network Change. A formal process, led by NWR, under which all users of the railway infrastructure comment on the proposed changes, leading to ORR approval. • Level Crossing Order. A formal process, led by the crossing operator, generally NWR, to secure approval to changes to the layout or operation of level crossings, leading to ORR approval. (ii) Realistic timeframe for these activities: The summary timeframe for the proposed rail works is as shown below. The necessary agreements will be put in place in time to enable this timeframe to be maintained. [Image omitted for brevity]
	Network Rail Response	The Applicant has responded outlining the Network Rail Governance for Railway Investment Projects and the necessary processes for access to the Network. An indicative programme has been provided by the applicant which will form the basis of discussion between the parties.

	SCC Comment	**The indicative timeframe provided by the Applicant does not include timescales for legal agreements. SCC understand that the East Suffolk Line infrastructure improvement proposals are currently at GRIP 2 stage. The Applicant / Network Rail have not progressed infrastructure requirements to GRIP 3 stage. SCC notes that Network Rail has recently adopted a new internal delivery process called PACE (Projects Accelerated in a Controlled Environment) and that this affords greater flexibility in the project development process and encourages faster decision-making in line with the Government's Project SPEED principles (Swift, Pragmatic and Efficient Enhancement Delivery).** **Similarly, Network Rail has recently introduced a new level crossing risk assessment process that is anticipated to streamline assessments.** **Recognising that third parties are not bound by GRIP or PACE but are nevertheless heavily influenced by Network Rail's processes, what is the anticipated improvement in programme as a result of the introduction of PACE and the new level crossing risk assessment process?**
2. Alternatives		
Al.1.30	ExQ for the Applicant	Site selection for the Sizewell Link Road The Site Selection Report, paragraph 7.4.27, recognises that Route W located to the south of Saxmundham was best placed to intercept the Sizewell C HGVs from the south. However, it is asserted that it would not have as effectively relieved B1122 communities of traffic as more northerly routes. Please explain the basis of that assertion and why greater weight was not placed upon the relief from HGVs and other traffic travelling from the south?
	Applicant Response	The Sizewell link road as proposed would be more effective at relieving HGV impacts on communities than Route W or any other route. Whilst HGVs from the south would travel further north along the A12 before turning onto the bypass to reach the proposed alignment of the Sizewell link road than they would with a route W alignment, that section of the A12 forms a bypass to Saxmundham of signifcantly lower environmental sensitivity than the section of the A12 through Yoxford or than the sensivitiy of the northern section of the B1122. As set out in response to Question Al.1.27 of this chapter, those communities are much better relieved by the selected route.

		The Sizewell link road is proposed to be open to the public and SZC Co. predicts that general traffic currently using the B1122 would transfer to the proposed Sizewell link road, as the Sizewell link road follows a similar alignment to the B1122. This will not only relieve those communities of Sizewell C traffic, it would reduce existing traffic flows through the villages of Middleton Moor and Theberton. In comparison, it is unlikely that as much existing B1122 traffic would reroute via a 'W North' alignment, due to its relative remoteness from the B1122. The issue of traffic volumes on the B1122 through Yoxford, Theberton and Middleton Moor were particular issues raised during the early consultation stages and these issues would not be resolved with the 'W North' alignment. The issue of relief from the south was also an important consideration – please see the repsonse to Question Al.1.27 of this chapter. The Sizewell Link Road Paper (Appendix 5D to this chapter) also explains that route W is no longer a feasible option due to its physical overlap with local plan allocations around Saxmundham.
	SCC Comment	**SCC has set out its views on the Sizewell Link Road routeing in SCC's Written Representation [REP2-189], including that "SCC has continued to ask the Applicant for a comprehensive explanation and justification of the chosen route, but the Applicant has not provided conclusive and acceptable evidence."** **SCC notes that Appendix 5D (and its supporting appendices and sub-appendices) [REP2-108] of the Applicant's Response to ExQ1s seeks to provide that further explanation and justification, in particular in section 8.4 of Appendix 11 to Appendix 5D and in Sub-Appendix D of Appendix 11 to Appendix 5D. It is unfortunate that this explanation has only belatedly been provided.** **SCC notes that, based on the Applicant's assessment in the Visum modelling in Appendix 10 to Appendix 5D, the Sizewell Link Road as proposed offers, in comparison to the "route W"/"D2", considerably less benefit in terms of shortening journey times and journey distance (and so CO2 emissions) for the majority of construction traffic (especially HGVs), and offers no significant legacy compared to "route W"/"D2". SCC reserves its position on the adequacy of that modelling but notes that it proceeds on the premise that: Buses from the northern park and ride at Darsham would use the B1122 rather than a SLR based on "route W"/"D"2 on the grounds of convenience; but that HGV construction traffic from the north would be directed to use that (longer) SLR route. SCC also notes that buses serving the Darsham Park and Ride would have a shorter/quicker journey if routed via the B1122 than via the SLR as proposed, but the modelling has assigned those buses to the proposed SLR.**

		In addition, the figures presented for HDV movements on the A12 at Yoxford in the Visum modelling differ from those presented by the Applicant in its Response to ExQ Al.1.27, and the references to paras 4.1.64 to 4.1.72 of Appendix 5D in that Response are not understood. **SCC is also not persuaded that, at the detailed design stage, it would not have been possible for an alignment evolved from "route W"/"D2" to be achieved which was compatible with the proposed Saxmundham Garden Neighbourhood. This, together with challenges to other points made in Appendix 5D paras 3.1.56 to 3.1.71, result in SCC not agreeing with the conclusions of the Environmental Appraisal Summary Table 8.14 of Appendix 11 to Appendix 5D. Furthermore, the work undertaken by the Applicant in respect of the comparisons between Route W and the proposed SLR fails to take into account the advantages that Route W would have in relieving settlements such as Saxmundham, Leiston, Coldfair Green and Knodishall of much of the SZC traffic passing through those places.** **However, SCC welcomes the provision of a clearer explanation of the Applicant's route choice than hitherto provided and, whilst it considers that the position is more finely balanced than is presented in [REP2-108], with a range of environmental and transportation benefits and disbenefits in both route options, and that no demonstrable 'best' solution emerges, it nonetheless acknowledges that the Applicant has made that choice and so formulated its proposals. SCC is therefore now focused on addressing that choice on its own merits. If the ExA wishes to further examine the feasibility and desirability of alternative routes to the SLR, SCC would be happy to provide further detail on its concerns about the route selection process.** **As referred to in the Written Representation[REP2-189]; notwithstanding SCC's concerns on the route selection process, SCC remains of the view that a relief road must be provided, and, faced with the actual proposal submitted in the DCO application before it, SCC supports the provision a new road as an acceptable way to mitigate the construction traffic impacts on the B1122 and, during the construction period, as an improvement when compared to the status quo. However, based on the environmental impacts of the proposed SLR accompanied with limited legacy benefits SCC maintains its view that the road should be removed when Sizewell C construction is complete.**

Al.1.33	ExQ for the Applicant	Site selection for the Sizewell Link Road The Suffolk County Council [RR-1174] submits that the SLR should not be permanent and instead be removed after Sizewell C construction is completed for the reasons set out in paragraphs 40 and 41 of its representation. It submits that the retention of the SLR would cause a greater permanent residual landscape and ecological impact than a temporary solution, as well as resulting in permanent loss of agricultural land. Since there is no strategic transport case for permanent retention of the SLR the Council requests the road to be removed after the construction period: (i) Please provide a detailed response to these concerns relating to the need to retain the SLR on a permanent basis at this location. (ii) Whilst the proposed development would help to reduce the amount of traffic on the B1122 through Middleton Moor and Theberton during the peak construction phase of the Sizewell C Project, is it necessary for it to remain to achieve a reduction in traffic during the operational phase? And (iii) Please identify and explain the advantages and disadvantages of retention of the road versus its removal?
	Applicant Response	(i) As a response to the Stage 4 consultation, a decision was made to propose the Sizewell link road as a permanent facility, rather than temporary. It was considered by SZC Co. that it would be preferable to avoid further disruption to local residents and the environment by removing the road and to leave the road as a lasting legacy of the Sizewell C project for the benefit of local communities but also for the benefit of providing good quality long term access to Sizewell. The Councils (Suffolk County Council and East Suffolk Council) submitted a joint response to Stage 4, in which ESC raised concerns about the potential environmental impact of the removal of the road. ESC stated (para. 241): “At Stage 3, ESC raised concerns with potential adverse environmental impacts of removal of a Sizewell Link Road post the construction phase. ESC retains this view and would not support proposals to remove a Sizewell Link Road post construction. ESC considers a separate HGV route to serve the existing A and B stations as well as the new C station to be a positive legacy of the development.” Further detail on environmental impacts of the removal of the Sizewell link road, and the need to retain the Sizewell link road on a permanent basis, is set out at Chapter 3, Section viii of the Sizewell Link Road Paper (Appendix 5D of this chapter).

		(ii) Retaining the Sizewell link road would result in a permanent reduction in traffic for communities along the B1122. The Sizewell link road would also be particularly beneficial when statutory outages, and forced/un-planned outages, occur in the operational stage of Sizewell B and C. This permanent reduction in traffic for communities along the B1122, as a result of the Sizewell link road, also offers other benefits, including sustained improvements in noise and air quality, particularly in Theberton. Further detail as to why the Sizewell link road should be retained for the operational phase, including how the Sizewell link road can help alleviate traffic from the B1122 during outages at Sizewell B and Sizewell C is set out at Chapter 3, Section viii of the Sizewell Link Road Paper (Appendix 5D of this chapter) (paragraphs 3.1.131 to 3.1.134). (iii) If the Sizewell link road is retained, there would be a number of advantages. Retaining the Sizewell link road would result in a permanent reduction in traffic for communities along the B1122, and would offer environmental benefits, particularly around Theberton. In the Councils' joint response to the Stage 4 consultation, the Councils state (para. 239) that the adoption of the whole Sizewell link road has yet to be agreed with SCC, however, the Councils (both Suffolk County Council (SCC) and East Suffolk Council (ESC)) summarise the environmental benefits around Theberton. Paragraph 246 of the Councils' response states: "The Councils [SCC and ESC] consider the Theberton Bypass as a legacy benefit of the development, by removing through traffic from the village, with likely associated benefits on noise and air quality and greater network resilience, and strongly believe it should be retained following construction." Retaining the Sizewell link road also will be particularly beneficial for communities along the B1122 when statutory outages occur in the operational stage of the power plant. It is estimated that during the maintenance and refuelling outages for just Sizewell C, approximately 1,000 additional staff would be required to work on site at any one time. Retaining the Sizewell link road will mean that these additional workers, and any necessary parts/ material/machinery, can avoid using the B1122, and will not have to travel through the villages of Yoxford, Theberton and Middleton Moor. ESC recognises the legacy benefit in retaining the Sizewell link road in the context of the Sizewell A, B and C, but also in relation to other projects, such as the Greater Gabbard and Galloper offshore windfarms. In the Joint Local Impact Report (dated May 2021 [EN010012]), ESC states (para 16.93): "Taking additional HGV movements from the B1122 and removing its role as the abnormal indivisible load route for Sizewell B and the existing substations for National Grid and Greater Gabbard and Galloper offshore windfarms justifies retention of the Sizewell Link Road. Its retention as a dedicated and purpose-built HGV and

		abnormal indivisible load route to Sizewell A, B, C, and to the existing offshore windfarm related substations, justifies its permanency". SZC Co. anticipates that the existing B1122 would be downgraded by SCC to an unclassified road once the Sizewell link road is operational. As the majority of traffic would reassign to use the Sizewell link road, the B1122 will experience much lower traffic volumes and could become more popular among cyclists, helping improve cycling connectivity in the immediate area. The advantages of retaining the Sizewell link road are set out in more detail at Chapter 3, Section viii of the Sizewell Link Road Paper (Appendix 5D of this chapter) (paragraphs 3.1.130 to 3.1.134). If the Sizewell link road was temporary, a significant amount of construction activity and traffic would be required to remove the Sizewell link road. The Sizewell link road would need to be built to a high standard. With a 10-12 year construction period and given the scale and nature of traffic involved, it is misconceived to think the Sizewell link road could be built as some form of temporary haul road. Its construction would require a large amount of construction material quantities, as set out in Volume 6, Chapter 2 (Description of Sizewell Link Road) of the ES [APP-446]. If the Sizewell link road was made temporary, the works would include the removal of the Sizewell link road itself, pavements, road drainage networks, utilities (cables, overhead lines) and the Pretty Road Overbridge. There would also be a need to reinstate parts of the A12 and B1122, including: removal of A12 Western Roundabout and reinstating the existing A12 alignment; removal of Middleton Moor roundabout and reinstatement of the existing B1122 alignment; and the removal of Sizewell link road tie-in to the B1122 at the eastern end of the Sizewell link road and reinstatement of the existing B1122 alignment. These activities would result in a significant amount of construction traffic. To construct the Sizewell link road, a large amount of material is proposed to be moved to the main development site. If the Sizewell link road was temporary, this material would have to be transported back to the Sizewell link road site to reinstate the land to the original condition or sourced from elsewhere if that material had already been incorporated in site landscaping. It is estimated that to move just this material from the main development site to the Sizewell link road site to reinstate the land would require 10,556 one way truck movements alone.65 This would be in addition to other construction traffic movements that would be needed for other works, including drainage and landscaping. The removal of the Sizewell link road has the potential for environmental impacts, and this was noted by ESC in response to the Stage 4 consultation. ESC stated (para. 241):

		"At Stage 3, ESC raised concerns with potential adverse environmental impacts of removal of a Sizewell Link Road post the construction phase. ESC retains this view and would not support proposals to remove a Sizewell Link Road post construction." Overall, the removal of the Sizewell link road would require a significant amount of construction activity and would have environmental impacts. It would also negate the benefit that road will bring to sensitive communities at Yoxford and on the B1122 and dent the community the long term benefits of relief to and the potential enhancement of the B1122 as a local road with an emphasis on walking and cycling.
	SCC Comment	**SCC has set out in some detail its position on its views as Local Highway Authority on the merits of the Sizewell Link Road, and its request to remove the Sizewell Link Road after construction of Sizewell C in its Written Representation [REP2-189] and refers the ExA to this document. There are a number of issues raised in the Applicant's response above that SCC considers would be helpful to add further comments on at this stage:** **Use during outages – While there are up to 1,000 additional workers on site during outages, only a minority will need to travel along the B1122, with the majority staying in the immediate area or travelling from the south and thus using shorter and quicker routes to access the A12. Furthermore, such outages are intermittent;** **Use for AILs at other energy schemes – All of the schemes quoted will be in place by the time that it is suggested that the SLR is removed and after that, the gap between the need for the use of AILs is likely to be measured in decades. The retention of the SLR, with its ongoing environmental damage cannot be justified on such occasional use;** **Impact of operations to remove the SLR – It is accepted that there would be environmental consequences of the physical activity of removing the SLR at the end of the construction period, but this would be a short term impact by comparison with the ongoing environmental impact of leaving it in place. We do not have detailed evidence to support the HGV movements suggested by the Applicant but note that, if it was clear from the outset that the road was to be temporary, then different arrangements for the storage of materials would be in place, similar to that used for the Green Rail Route rather than hauling it all off-site and thus significantly reducing this impact.**

Al.1.35	ExQ for the Applicant, SCC	Electrical connection to the National Grid substation The Suffolk County Council [RR-1174], submits that the provision of four additional tall pylons with overhead lines on the development site would have considerable additional detrimental impact on the Suffolk Coast and Heaths AONB. The review on behalf of the Council by Pöyry Energy Limited (AFRY) indicates that the use of Gas Insulated Lines (GIL) to connect to the National Grid (NGET) substation is a feasible alternative to overhead lines and pylons. This technical report has been supplied to the applicant for consideration: (i) Please explain further on whether GIL would provide a viable and less impactful alternative in this location? (ii) If not already submitted, please provide a copy of the AFRY technical report.
	Applicant Response	(i) The use of gas insulated lines was considered but would not be feasible at Sizewell C due to unacceptable impacts on the operability and security of the site. The proposed operational site is extremely compact, thereby minimising overall land take, so all areas above ground would be occupied by buildings, roads or working areas. A number of potential routes were considered for gas insulated lines at high and low level, but in all cases the supporting structures or the lines themselves would impair either the normal operation of the power station or physical security of the site. A Power Export Connection Technical Recommendation Report has been prepared, which looks at the feasibility of the 3 main design solutions: • Underground Cable • Gas Insulated Line • Overhead Line Please refer to this report (at Appendix 5E of this chapter) for more detailed assessment of the GIL solution. (ii)The AFRY report was commissioned and is held by Suffolk County Council.
	SCC comment	**SCC wishes to refer the ExA to its Written Representation [REP2-189] setting out its views, and the evidence from its technical consultants, on the potential of the use of Gas Insulated Lines as an alternative to pylons and overhead lines. The Council had been able to see a pre-submission version of the report referred to by the Applicant as Appendix 5E and therefore its Written Representations do cover the matters raised in the Applicant's response to this question.**
Al.1.36	ExQ for the Applicant	Electrical connection to the National Grid substation The ES Appendix 8.4 A Site Selection Report indicates that the 4 and 5 pylon and undergrounding options were assessed at Stage 4. The four pylon option was the preferred option. (i) Notwithstanding the details provided in the Site Selection Report, please explain further the safety issues and significant safety and programme-related risks associated with the construction and operation of an underground cable option that specifically apply to this location? (ii) Why could any adverse impact on the SSSI not be satisfactorily overcome by mitigation?

	Applicant's Response	(i) The only underground solution that could achieve the required power ratings, meet requirements for inspection and maintenance access, and avoid the buildings and structures required within the Sizewell C site would be to install cables in dedicated galleries. However, detailed investigation has shown that there are no feasible options available to introduce additional galleries within the constraints of the site. Construction of an underground gallery solution for Unit 1 would not be feasible. The proximity of Unit 1 to Sizewell B means that constructability and space constraint issues are not surmountable. Construction of an underground gallery solution for Unit 2 could be considered but would not be acceptable due to the impacts on safety and construction schedule. It is also considered that the knock-on impacts on the environment would be unacceptable. Accommodating the gallery within the site could only be achieved by increasing the size of the main platform to the north, resulting in further loss of the Sizewell Marshes SSSI. In addition, the construction schedule would be prolonged by a significant period of time as there would still be insufficient space for all the excavations required to construct the gallery without halting or severely disrupting other construction activities. Furthermore, the reduced reliability of a cable connection introduces nuclear safety concerns, contradicting the need to ensure that risk is As Low As Reasonably Practicable (ALARP). Nuclear safety could be degraded compared to Hinkley Point C, which is not acceptable. A more detailed examination into the safety and programme related risks are set out in the Power Export Connection Technical Recommendation Report at Appendix 5E of this chapter. (ii) The underground cable option would result in additional permanent land take of the Sizewell Marshes SSSI. Although compensatory habitats would be put in place to offset the loss of reedbeds, ditches and wet woodlands from the SSSI based on the layout in the DCO proposals, the extent of compensatory habitats has not got an embedded 'contingency' to offset the additional habitat loss which would be associated with the undergrounding solution. If the undergrounding solution were progressed, the net habitat loss would not be fully compensated for and this would increase the magnitude of effect on SSSI habitats to significant adverse. This would represent a conflict with paragraph 5.3.7 of NPS EN-1, which requires development, as a general principle, to aim to avoid significant harm to biodiversity. Moving the northern edge of the platform northwards to accommodate the underground galleries would also reduce the retained SSSI corridor west of the SSSI crossing. SZC Co has already been challenged by all ecological stakeholders on the potential fragmentation effects of introducing the design for the SSSI Crossing at the eastern end of the retained SSSI corridor. Narrowing the retained SSSI corridor to the west of the SSSI crossing would reduce the value of the corridor by: reducing the habitat extent; reducing its functional width to any animals moving through the corridor; and, by bringing both construction and operational disturbance closer to the retained Leiston drain.

	SCC comments	**SCC wishes to refer the ExA to its Written Representation [REP2-189] setting out its views, and the evidence from its technical consultants, on the potential of the use of Gas Insulated Lines as an alternative to pylons and overhead lines. The Council had been able to see a pre-submission version of the report referred to by the Applicant as Appendix 5E and therefore its Written Representations do cover the matters raised in the Applicant's response to this question.**
3. Compulsory Acquisition		
CA.1.67	ExQ for the Applicant	Adequacy of any Protective Provisions set out in the dDCO and the need for any other Protective Provisions to safeguard relevant interests The relevant representation of Suffolk County Council [RR-1174], seeks Protective Provisions for its role as the Local Highway Authority in order for it to continue to discharge its duties under the Highways Act (1980) within those parts of the public highway included within the Order Land. The Council also proposes that Protective Provisions should be considered for other topic areas, such as its Lead Local Flood Authority and statutory archaeological roles. Please respond and indicate whether any such protective provisions are being negotiated and/or have been agreed?
	Applicant's Response	SZC Co. considers that the Article 21 process provides sufficient protection to SCC in their role as Highway Authority. SZC Co. will continue to work with SCC to ensure they are comfortable. Please see the response to Question DCO.1.30 in Chapter 14 (Part 4) of this report which explains the Article 21 process.
	SCC Comment	**SCC notes the view of the Applicant on the matter of Protective Provisions but considers that there is not the necessary certainty yet provided for the protection of the Council as Local Highway Authority (LHA) through this process. Unless these matters can be resolved through the Article 21 process and / or other agreements before the completion of the Examination, then SCC would prefer the clarity of a set of Protective Provisions to be inserted as a Schedule to the DCO. SCC notes that protective provisions have been provided for the LHA in other DCOs. In order to aid the process of taking this forward, SCC is drafting text for such Provisions and will share this with the Applicant shortly with the aim of reaching agreement on the matter. Further progress on this will be reported at Deadline 4.**

4. Cumulative Impacts		
Cu.1.22	ExQ for the Applicant	Cumulative effects with other plans, projects and programmes SCC [RR-1174] considers that the full cumulative impacts of the existing and potential future projects in the East Suffolk area have not been adequately assessed. (i) Please indicate whether any further information has come to light on the schemes considered by the ES and other schemes coming forward since the time of the assessment including offshore wind projects, inter-connector cables across the North Sea and the interconnector project to Kent; (ii) Please summarise the proposals for the delivery of traffic mitigation schemes and explain how that could be achieved in practice without disrupting traffic from other projects including use of the A12/B1122 and A12/A1094/B1069 transport corridors by East Anglia ONE North and East Anglia TWO traffic; (iii) Please explain how cumulative impacts which are not currently proposed to be mitigated due to the length of time they are expected to occur and their deemed likelihood of occurring would be monitored, identified and then mitigated should they in fact occur?
	Applicant's Response	(i) The Applicant has reviewed the list of cumulative schemes considered within the ES against the cumulative schemes listed within the Joint Local Impact Report [REP1- 044], and has concluded that no additional schemes would need further assessment. Table 1.1 of Appendix 13A provides a summary of the changes to the status of energy Nationally Significant Infrastructure Project (NSIPs) in close proximity to the Sizewell C Project and identifies any new information that has been made available. This has been prepared using the information made publicly available at the time of writing. Appendix 13A provides an updated assessment based on the identified new information and concludes that the changes to the nearby energy NSIPs would result in no new or different significant effects than those reported in Volume 10, Chapter 4 of the ES [APP-578] or in Volume 1, Chapter 10 of the ES Addendum [AS-189]. It is noted that the SCD1 and SCD2 Interconnectors are at an early stage with very little information available in relation to the proposals (no public consultation or EIA Scoping reports have been completed to date). Therefore, due to lack of information, it has not been possible to provide a cumulative assessment with SCD1 and SCD2 at this stage. It is noted that these projects would be required to complete their own cumulative assessments with other infrastructure projects as part of the planning process.

		(ii) For the construction of the Sizewell C Project the delivery of highway mitigation schemes will be undertaken in two distinct phases: • Design Phase • Construction Phase Both phases will be developed to reduce disruption during construction and to provide the required access to other developments surrounding Sizewell C. The preliminary design stage has taken cognisance of the potential disruption to road users during the construction phase. Design considerations taken during the preliminary design stage include: • Optimising the alignment of proposed roundabouts and junctions so that most of the new construction can be undertaken outside the footprint of the existing highway network. • Considering pavement design so that pavement overlays can be undertaken on sections of the proposed tie-in works with the existing highway in lieu of full depth road construction. • Identification of reduced speed limits in the vicinity of construction works. These design considerations provide the following benefits to the existing road users: • Reduced construction duration on live road networks where much of the works are undertaken off-line. • Reduced interface duration with existing road users during tie-in works between proposed and existing road networks. The construction phase will require detailed consultation with Suffolk County Council in the development and approval of Traffic Management Plans for all interventions on the existing highway network. SZC Co. has held initial discussions with Suffolk County Council on proposed traffic management arrangement to be implemented during construction. The following traffic management principles have been broadly agreed with Suffolk County Council: • Proposed roundabouts and junctions will be prioritised and constructed early in the construction programme subject to construction access dates.

		• All highway interventions will be developed, approved and programmed in consultation with Suffolk County Council prior to commencement of working on the existing road network. • A12 and B1122 interventions such as tie-in works will be undertaken during offpeak travel times (night time or weekends). • All Interventions on the existing highway network will always aim to maintain one way traffic flow under traffic light signal traffic management arrangement. Where necessary, road closures will be planned and coordinated with Suffolk County Council with alternative diversion routes communicated with road users and other impacted stakeholders. • Use the new roundabouts for site access following their construction. • Access to and from the A1094 to the A12 to be maintained during construction of Friday street roundabout. As with the design phase, the aim of the construction phase traffic management principles is to reduce the impact on existing road users and continue to provide access for other projects. (iii) SZC Co. proposes to manage Sizewell C construction traffic through the implementation of a Construction Traffic Management Plan (Doc Ref. 8.7(A)) and Construction Worker Travel Plan (Doc Ref. 8.8(A)), which would be monitored on a quarterly basis throughout the construction phase and reviewed through a Transport Review Group (TRG). The TRG would include representatives from SZC Co., the local authorities and Highways England. A Transport Contingency Fund is to be established by SZC Co. through the Deed of Obligation (Doc Ref. 8.17(C)) and made available to the TRG in the event that further mitigation or corrective actions are required. SZC Co. proposes to monitor the cumulative effects of Sizewell C with Scottish Power Renewables of East Anglia 1 North (EA1N) and East Anglia 2 (EA2) during the construction phase and, if any significant effects arise, could utilise the Transport Contingency Fund to implement additional measures to manage/reduce Sizewell C effects. SZC Co. would support a proportionate approach to funding of any mitigation measures in the event that significant cumulative transport effects arise through the monitoring process.

	SCC Comment	**(I) There is the likelihood that there will be consultation on the Nautilus and maybe Eurolink projects during the duration of the Sizewell C Examination and that these will need to be taken into account when they are published.** **(ii) Discussion regarding the traffic management necessary to deliver the associated works is at an early stage but general principles have been agreed with the Applicant. Specifically:** • **Proposed roundabouts and junctions will be prioritised and constructed early in the construction programme subject to construction access dates.** • **All highway interventions will be developed, approved and programmed in consultation with Suffolk County Council prior to commencement of working on the existing road network.** • **A12 and B1122 interventions such as tie-in works will be undertaken during offpeak travel times (night time or weekends).** • **All Interventions on the existing highway network will always aim to maintain one way traffic flow under traffic light signal traffic management arrangement. Where necessary, road closures will be planned and coordinated with Suffolk County Council with alternative diversion routes communicated with road users and other impacted stakeholders. Temporary traffic signal will create some delays and the LHA may place limitations on their use during peak hours.** • **Use the new roundabouts for site access following their construction.** • **Access to and from the A1094 to the A12 to be maintained during construction of Friday street roundabout. This may require temporary carriageway due to the constraints of the site.** **SCC has accepted that concurrent construction of separate sites is acceptable to deliver the associated developments as early as practical provided that an overall minimisation of disruption to road users can be demonstrated.** **SCC notes that in the Implementation Plan V2.0 (REP2-044) the A12/B11222 Yoxford Roundabout is not planned to start until 6 months after FID. Earlier delivery of this element is critical to the project as it's construction will effect all HGV traffic to Sizewell C. While the applicant has stated that this can be built offline the constrained nature of the site, drainage design and significant areas of tie in to existing highway will make this challenging.**

		(iii) The Applicant's response only deals with cumulative impact of traffic, despite the question being broader. The Examining Authority may wish to consider whether it wishes to have any clarification on other matters.
Cu.1.23	ExQ for the Applicant	Cumulative effects with other plans, projects and programmes SCC [RR-1174] in respect of the cumulative ecological impact, submits that it is not clear why the construction of the EA1 North and EA2 have been scoped out of the assessment of cumulative impacts, particularly in respect of Natura 2000 sites, when the cable corridor passes relatively close to the Sizewell C project. Please provide further details and reasoning to justify the scoping out of that matter from the cumulative impact assessment.
	Applicant's Response	Volume 10, Chapter 4 of the ES [APP-578] considered the potential for cumulative ecological effects to arise with the offshore components of EA1N and EA2 along with EA3, however, concluded that there would not be a potential for the onshore components of these schemes to result in cumulative ecological effects when considered in combination with the Sizewell C Project. The Applicant presented additional information on the cumulative ecological effects with the onshore components in Volume 3, Appendix 10.4.C of the ES Addendum [AS-201]. It considered the potential for cumulative effects with EA1N, EA2 and EA3 on the following receptor groups during construction: • Designated sites; • Farmland birds; and • Bats. The updated assessment concluded that construction and operation of the onshore elements of the three offshore windfarms, would not change the conclusions of the operational cumulative ecological effects and would remain as described within Volume 10, Chapter 4 of the ES [APP-578]. In addition to this, Appendix 13A considers any recent changes that have been made to the nearby energy Nationally Significant Infrastructure Projects (NSIPs), scoped in to the cumulative effects assessment in Volume 10 of the ES [APP-572 to APP-582]. In relation to the three offshore wind farms, the new information related to the construction programme only which would not change the conclusions of cumulative ecological effects assessment described within Volume 10, Chapter 4 of the ES [APP-578].

	SCC Response	**If there is an overlap in the construction periods of EA1N and EA2 (and in particular the cable corridor) with that of SZC, then there is likely to be some cumulative impact on, in particular, farmland birds. This will be difficult to mitigate other than by the provision of skylark plots elsewhere**
Cu.1.25	ExQ for the Applicant, SCC	Cumulative effects with other plans, projects and programmes SCC [RR-1174] considers that the cumulative pressure on the local housing stock may increase impacts in East Suffolk and may push workers to look further afield creating pressures on adjacent authorities such as Ipswich and Mid Suffolk. (i) Please respond to the criticism that appropriate monitoring and mitigation measures need to be put in place for all affected areas, to ensure housing impacts are managed and mitigated. (ii) Should anything else be included in the accommodation strategy and other measures related to housing in addition to those measures already set out in the Mitigation Route Map?
	Applicant's Response	Response to (i) The cumulative effect on demand for accommodation is considered in Volume 10, Chapter 4, paragraphs 4.3.64-4.3.66 (Project-wide, Cumulative and Transboundary Effects) of the ES [APP-578]. It is not clear from information provided by other projects in the public domain that there would be a substantial demand for accommodation from their NHB workforce, particularly in the areas around Sizewell C's main development site where accommodation effects from the Sizewell C Project are likely to be greatest. From review of offshore wind projects, it appears that there are significant differences in the demand for accommodation both in terms of the sector of accommodation being sought (most demand would be for tourist sector accommodation rather than PRS or owner occupied accommodation); and peak demand would occur well before the peak of Sizewell C's demand. SZC Co. notes that this conclusion has also been reached by SPR in its further consideration of cumulative accommodation effects related to East Anglia ONE North and East Anglia TWO with Sizewell C. As such, the cumulative effects on local housing stock are considered to be greatest as a result of the effect of the Sizewell C Project's peak NHB construction workforce. As set out in Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195], those effects are likely to be negligible at the wider scale with localised

		significant adverse effects likely to be concentrated in areas of east Suffolk very close to the main development site, prior to mitigation. SZC Co. has developed a detailed set of measures including a Housing Fund capable of delivering in the region of 1,200 bedspaces by the peak of the Sizewell C Project's workforce profile (i.e. as many private rented bedspaces as are predicted to be sought by NHB workers at peak), alongside an Accommodation Management System and measures to support the tourist accommodation sector and the resilience of statutory housing services for ESC. Proposed measures are detailed in the Accommodation Strategy [APP613] and the Draft Deed of Obligation, Schedule 3 (Doc Ref. 8.17(C)). Effects and the effectiveness of mitigation will be monitored through an Accommodation Working Group including monitoring of workforce size, location and accommodation sector, and measures of stress on the housing market, and governed so that the Housing Fund is largely within the ability of ESC to direct to mitigate for potential effects. Proposed measures are detailed in the Accommodation Strategy [APP-613] and the Draft Deed of Obligation (Doc Ref. 8.17(C)). As such, it is not considered that the residual effect of the Sizewell C Project would push workers to look further afield creating pressures on adjacent authorities. Effects are not likely to be significant at a wider scale, and are anticipated to be fully mitigated, and supported by a responsive governance system to monitor effects. SZC Co. notes that Suffolk County Council recognise that (paragraph 161 [RR-1174]): “Pressure on existing housing stock in east Suffolk [is] proposed to be mitigated by a Housing Fund”; and “NonSizewell C projects may have similar or alternative means to address impacts on housing stock”. Response to (ii) For the reasons set out above, it is therefore not considered that anything else should be included in the accommodation strategy and other measures related to housing, in addition to those measures already set out in the Mitigation Route Map (Doc Ref. 8.12(B)).

	SCC Response	**The southern part of the East Suffolk District is closely linked to the geography of Ipswich and they are defined as being within the same Housing Market Area. Therefore, any pressures on the East Suffolk area from the SZC project alone or in combination with other projects may be reflected in Ipswich, albeit at a more reduced level given the distance decay impacts. Furthermore, it is anticipated that a proportion of the workforce will be resident in Ipswich. The same issues apply though to a lesser extent in Mid Suffolk District. In due course, it may be determined that there is no significant impact occurring in these areas but there should be provision for the Accommodation Working Group to include these areas in the monitoring suggested by the Applicant and for remedial action, if necessary.**
5. DCO		
DCO.1.2	ExQ for the Applicant, the Host Authorities	Art 2. Definition of "commence" and the exclusions from it. (i) Are the exclusions justified for all of the Proposed Development? (ii) Might it be appropriate to exclude later phases and to limit the exclusions to the earliest phases of the Proposed Development? In both (i) and (ii) please explain concisely why.
	Applicant Response	(i) It is considered appropriate and justified that the exclusions (as updated in Revision 4 of the draft DCO (Doc Ref. 3.1(C)) to make an exception of important hedgerow and dewatering works on the main development site) apply to all of the authorised development. The site clearance and hedgerow removal works described in DCO.1.0 must be carried out in general accordance with the Code of Construction Practice (Doc. Ref. 8.11(B)), in accordance with the Terrestrial Ecological Monitoring and Mitigation Plan (TEMMP) [REP1-016] and the Main Development Site Clearance Plans [AS-120], as required by Requirements 2, 4 and 6 respectively. Requirements 2, 4 and 6 are not pre-commencement requirements and therefore the definition of 'commence' (and, in particular, the 'site preparation and clearance works' exception) have no bearing on the applicability of these requirements. It should be noted that • the Applicant has updated the drafting of Requirements 14A and 14B in revision 4 of the draft DCO (Doc. Ref 3.1(C)) to ensure that the 'site preparation and clearance works' exception could not be interpreted as having the effect of overriding the requirement to submit and obtain approval of a fen

		meadow plan and wet woodland plan before vegetation clearance is carried out within the Sizewell Marshes SSSI; and • the Applicant has added to the 'site preparation and clearance works' exception in revision 4 of the draft DCO (Doc. Ref 3.1(C)) a carve out for the removal of any important hedgerows within Work No. 1A to ensure that Requirement 3 must still be complied with in respect of such activities to ensure that site specific WSIs are submitted to and approved by SCC in relation to their removal. (ii) For the reasons given in response to questions DCO 1.0, DCO 1.1 and part (i) above, it is considered that the exceptions to the definition of 'commence' (as amended) are appropriate and justifiable, and that there are no gaps in mitigation (as secured by Requirement) created as a result. As such, the Applicant considers that it is not necessary to limit any or all of the exclusions to earlier phases of the development.
	SCC Comment	**SCC will consider in due course any response from the Applicant to its Deadline 2 suggestion that the exemption for temporary buildings and structures should be limited (as per the draft Wylfa Order) so that the exemption only applies to buildings of a certain height (in Wylfa it was two storeys).** **SCC notes the change made in revision 4 of the Order to the exception for site preparation and clearance works (paragraph (a) in the definition), where removal of important hedgerows has been carved out. SCC would welcome an explanation of why a similar change has not been made to paragraph (d).** **In any event, as a consequence of the change to (a), it would seem paragraph (d) should now begin "(subject to paragraph (a))"**
DCO.1.6	ExQ for the Applicant, the Host Authorities	Art 2 – definition of "local planning authority". This defines the phrase to mean East Suffolk Council and its successors in title. Successors in title is a phrase more normally used in relation to land interests (title) than statutory functions. Please will the Applicant and Host Authorities consider whether the phrase "successors to its functions as local planning authority as defined in the Town and Country Planning Act 1990" would be more appropriate? The ExA consider this is probably what is intended given that the functions of the local planning authority specified in the DCO are largely of a development control nature. However, might it not be simpler simply to adopt the definition in the TCPA 1990 (s.1 is the relevant section, combined with s.336). That way, any local government reorganisation or reallocation of planning functions will be taken through to the operation of the DCO automatically rather than relying on an interpretation of

		who is meant by the Secretary of State as the successor to the "title" or functions of ESC, which are wider than planning. The ExA is aware of the Inspectorate's guidance note's preference for naming authorities. If the intention of the definition is to ensure that the planning matters allocated to the local planning authority by the DCO are allocated to the district council rather than to the county (which is normally limited to minerals and waste planning) then the use of the TCPA definition could be refined to exclude the county council.
	Applicant Response	See Appendix 14A - DCO Drafting Note 1.
	SCC Comment	**SCC is content with the change that has been made to the definition of "local planning authority" in revision 4 of the DCO, with the removal of "successors in title".** **SCC also supports the retention of the references to the names of SCC and ESC throughout the order.** **However, SCC does not consider that the proposed new paragraph 2(5A) (wrongly set out as "5(A)" in revision 4) is necessary. If there were a further local government reorganisation in the area, then the responsibilities of SCC and ESC would devolve to their successors in accordance with the legislation that underpinned the reorganisation. Such legislation would be very unlikely to say "the functions of SCC <u>in its capacity as highway authority</u> are transferred to [X] Council".** **SCC refers to the Local Government (Structural Changes) (Transfer of Functions, Property, Rights and Liabilities) Regulations 2008 and, in particular, regulations 3 and 4.** **In any event, not every reference to SCC in the Order relates to it in its capacity as a local highway authority. For example, the reference to SCC in requirement 3 is about its functions relating to archaeology.** **New article 2(5A) should therefore be removed.**
DCO.1.7	ExQ for the Applicant, the Host Authorities	Art 2 – definition of "maintain" and Art 6 – power to maintain. The definition includes "alter, remove or reconstruct". On its face, that would include decommissioning and the construction of a new power station. The ExA doubts this is what is intended and notes that there is intended to be a limit by reference to new or materially different environmental effects. However, lesser reconstructions may pass that test but nonetheless be development which ought to be regulated by planning control?

		(i) Might the following definition be adequate: "maintain" includes inspect, repair, adjust, alter, clear, refurbish or improve, and any derivative of "maintain" is to be construed accordingly", with the addition of the prohibition relating to maintenance causing environmental effects? (ii) If the Host Authorities consider that the current definition is too wide, would they please give examples of development it permits but which the Host Authority considers should be subject to planning control? Would they please also consider whether the ExA's suggestion above would deal with their concern and give reasons? (iii) If the Applicant disagrees with the ExA's suggestion, please will it, in answering the question, explain clearly the intent of the breadth of the definition and reflect on whether it ought to be reduced? (iv) See also the ExA's questions on Sch 2 para 1 (tailpieces in the context of EIA). Taking that also into account, how does the Applicant expect that the prohibition relating to maintenance causing environmental effects would work in practice and be enforced? How would the local planning know in advance of an item of maintenance that materially new / different effects would be caused by the maintenance? What action would they be able to take? Or is the intention and practice simply going to be that maintenance which breaches the prohibition would be without approval, a breach of the DCO and therefore a criminal offence? Please will the Host Authorities also consider question (iv) and respond?
	Applicant Response	See Appendix 14F - DCO Drafting Note 6
	SCC Comment	**(i) No further comment at this time.** **(ii) No further comment at this time.** **(iv) SCC remains of the view that where appropriate, it should be consulted on whether there are new or materially different significant environmental effects.**

DCO.1.9	ExQ for the Applicant, the Host Authorities, MMO	Art 2, definition of "mean high water springs". Does the time period need to be specified?
	Applicant Response	The Applicant does not consider that it is necessary to specify the time period. The suggested definition is frequently used in granted development consent orders to express the landward boundary of the MMO's jurisdiction, for examples see: The Cleve Hill Solar Park Order 2020; The Hornsea Three Offshore Wind Farm Order 2020; The Norfolk Vanguard Offshore Wind Farm Order 2020; The Walney Extension Offshore Wind Farm Order 2014; Rampion Offshore Wind Farm Order 2014; Hornsea One Offshore Wind Farm Order 2014; Galloper Wind Farm Order 2013; and Triton Knoll Offshore Wind Farm Order 2013.
	SCC Comment	**SCC agrees no time period is necessary and refers to its original response where it pointed out common drafting from harbour revision orders.**
DCO.1.18	ExQ for the Applicant, the Host Authorities	Art 2(5) – references to statutory bodies. This reads as follows: "References to any statutory body includes that body's successor bodies from time to time that have jurisdiction over the authorised development". Why are bodies who do not have jurisdiction over the development excluded from the reference. Are all the references in the DCO to statutory bodies only to such bodies with jurisdiction over the development?
	Applicant Response	See Appendix 14A - DCO Drafting Note 1.
	SCC Comment	**Whilst the changes to art 2(5) are an improvement, SCC remains unsure about why article 2(5) is required at all. If a statutory body is abolished, merged or reorganised, then it will be done by statute, and the statute will make provision about what happens to the original body's functions. There is no need to say that a statutory body includes its successors.**
DCO.1.21	ExQ for the Applicant	Art 4(1) – vertical limits of deviation.

		This permits unfettered vertical deviations, subject to the Requirements and provisions in Art 11 relating to streets. Art 4(2) limits vertical deviation to 1 metre for Work 4C (Saxmundham – Leiston branch line) and Works 11 and 12 (Two village bypass and the Sizewell Link Road). The ExA see that the Requirements contain some references to Parameter Plans. But to take requirement 11 as an example, it is not immediately clear that Work Nos. 1A (a) to (e) are subject to the Parameter Plans (though any variations from the Approved Plans and the design principles in Ch 5 of the Main Development Site Design and Access Statement must accord with the Main Development Site Operational Siting and Height Parameters and two of the three Main Development Site, Operational Parameter Plans). (to be found at SZC Book 2, 2.5, [APP-018]). Similarly, a somewhat close reading of the Requirements is necessary to see which Parameter Plans have been applied to which Work, whether they are applied to the right Works, to ascertain whether the whole of the Proposed Development is limited by the Parameters Plans and whether or not all the Parameters Plans have been applied. As the ExA reads the Requirements and the rest of the DCO there appears to be no general overriding rule that the development must not exceed the limits in the Parameter Plans. A clear straightforward limitation in the DCO preventing the Proposed Development from exceeding the Parameter Plans (which the ExA assumes describe the limits of what was assessed on normal Rochdale principles) would be helpful. (i) Please will the Applicant insert such a provision in the next draft of the DCO or alternatively explain why it would be inappropriate? (ii) Please will the Applicant also provide a reconciliation of the Parameter Plans in the DCO with the project assessed in the ES? Please will the Applicant specify and explain the power for Art 4 – it is not referred to in the EM?
	Applicant Response	See Appendix 14I – DCO Drafting Note 9

	SCC Comment	**SCC have focussed on the issue of the pylons in this response, and reserves its position on other works.** **In its response (drafting note 9), the Applicant sets out detailed responses in respect of different works. In relation to the main development site, for example, it refers to the detailed plans for approval set out in Schedule 7 and the various parameter plans. The Applicant says in paragraph 1.3.1(E), that "*Pursuant to R11 (MDS: Approved buildings, structures and plant), R12 (MDS: Reserved matters); R12B (MDS: Coastal Defences) and R13 (MDS: Ancillary structures, other buildings and plant), the MDS works must be carried out either in accordance with the detailed plans which are for approval as part of the DCO, or with detailed plans to be approved by ESC in due course. In the latter case, the details must be in accordance with, inter alia, the relevant parameter plans (which are listed in each case*)."** **However, those requirements do not appear to apply to all the pylons, presumably because they are not all in the MDS. In particular, the National Grid pylon (work 1A(q)) is not referred to in any of the requirements, unlike the 4 pylons within the MDS (Work 1A(d)) which are referred to in r11.** **So even though all 5 pylons are shown on the "Pylons detailed plans for approval" [APP-019] (included in the list in Schedule 7), and those plans show the elevations of all 5 pylons, there appears to be nothing in the DCO requirements which requires the NG pylon to be no higher than shown on that plan, or in the operational parameter plans.** **SCC would ask the Applicant to clarify the position and explain if there are any other works which may be mentioned in works or parameter plans but not in the requirements.**
DCO.1.23	ExQ for the Applicant, the Host Authorities	Art 5(3). Is this inserted simply for the avoidance of doubt or is there a specific concern that Art 5 restricts any other powers in the DCO?
	Applicant Response	See Appendix 14C - DCO Drafting Note 3
	SCC Comment	**The Applicant's response appears to be satisfactory.**

DCO.1.26	ExQ for the Applicant, the Host Authorities	Art 9(6). The EM states (para 4.25) "As the undertaker will be entering into a section 106 agreement with local planning authorities, this provision is necessary to ensure that the transferee complies with all obligations etc. that have been imposed on the undertaker, as well as ensuring that the undertaker is released from liability upon transfer (given that it would no longer be involved in the authorised development). This approach is standard under section 106 agreements". (i) Whilst confirmation that planning obligations are to bind the transferee / lessee is welcome, why would the planning obligations under s.106 TCPA not bind the transferee under s.106(3)? Or is this paragraph addressing transfer / lease of the benefit of the DCO without transfer / lease of land? (ii) Should transfer / lease of benefit without transfer / lease of land be permitted? (iii) If so, is it proper to allow the transferor to escape from its obligations in the s.106 agreement? (iv) Is it appropriate in the case of any transfer or lease on this project to allow the original covenantor to escape from its obligations under s.106?
	Applicant Response	See Appendix 14A - DCO Drafting Note 1
	SCC Comment	**The issue of the approach to how obligations are to be secured is evolving, and SCC's latest position is set out in its D3 submission "Suffolk County Council comments on draft s.106, accompanying draft Explanatory Memorandum and draft Confirmation and Compliance Document". The following summarises SCC's position on the evolving approach:** • **The Applicant now proposes that a Deed of Obligation is entered into under powers in section 111 of the Local Government Act 1972. This document would not be entered into using the powers in section 106 of the Town and Country Planning Act 1990 ("1990 Act"). This Deed of Obligation is proposed to only bind the "undertaker" under the DCO (or an entity who is transferred the benefit of DCO provisions) and not bind any land.**

		• **SCC seek clarity on the powers that the Applicant intends to utilise to enter into the Deed of Obligation (e.g. whether section 1 of the Localism Act 2011 would also be used) and the advantages of circumventing the legal requirements of section 106 of the 1990 Act are questioned.** • **Given no land (or land owner) is proposed to be bound into the Deed of Obligation, SCC raise questions as to how confident it can be that it may only be the undertaker who may construct, take the benefit of and also subsequently carry out and use the authorised development permitted under the DCO (so no other entity should be bound) and what action may be taken in the event others who have the benefit of the DCO breach such a Deed of Obligation.** • **SCC have yet to see the Applicant's drafting which the Applicant considers might incorporate some of the enforcement options that would be open to SCC under a section 106 agreement, and this is highlighted in the note.** • **Particular concerns about the mechanism for transferring the benefit of some or all of the DCO provisions and the liability of a transferee under any Deed of Obligation are raised in the note. A deed of adherence from any such transferee is sought before such a transfer may take effect to provide comfort that a transferee will be bound by the provisions in such a Deed of Obligation (and which provisions they would be bound by).** • **SCC's dissatisfaction with the Applicant's proposed deemed approval mechanism in the document is reiterated and requirements to only use "reasonable endeavours" to comply with certain obligations.**
DCO.1.27	ExQ for the Applicant, the Host Authorities	Art 9. (i) 9(1) Is it appropriate to transfer the CA powers in this DCO? The Applicant is required to demonstrate adequate resources to pay compensation. A transferee may not be have the same resources and the article does not expressly require that they are shown to exist. (ii) 9(1)(b) Should the CA powers be lettable? What would be the lessee's title to land compulsorily acquired and to whom would such land be transferred on CA? Does CA by a lessee raise any difficulties? (iii) 9(1) and (2) What would be the criteria for the SoS to decide whether or not to consent?

		(iv) Art 9(4). Is it appropriate for decisions of the Secretary of State on what is largely a regulatory issue to be subject to arbitration? (v) Art 9(6)(a). It is clear that the alienation provisions of Art 9 allow alienation of part of the land or part of the benefits. It would appear that Art 9(6)(a) attempts to limit the burdens transferred to those "imposed by virtue of the provisions to which the benefit relates". However, it is unusual for burdens to be divided up across the land or benefits. And burdens may be imposed on the whole development or project. Please will the Applicant amend the article so as to ensure that burdens, whether they relate to the whole benefit of the order or only the benefit transferred, bind the transferee or lessee as the case may be?
	Applicant Response	See Appendix 14A - DCO Drafting Note 1.
	SCC Comment	**(i) The Applicant's response aligns with SCC's,** **(ii) No further comments.** **(iii) No further comments.** **(iv) SCC note the exclusion that has been inserted as article 82(4) to meet this point. This is a matter for the Secretary of State rather than SCC. SCC also notes that article 9(2) which would have imposed a time limit on the Secretary of State to give consent has been removed.** **(v) to (vii) As noted before, these are questions for the Applicant.**
DCO.1.30	ExQ for the Applicant, SCC	Part 3 (Arts 11 – 23) generally. Please will the Applicant and SCC explain how the adoption of new roads is addressed.
	Applicant Response	The construction and maintenance of any new or altered streets is provided for in Article 20 of the draft DCO (Doc. Ref. 3.1(C)). As set out in Article 20(1): the construction must be to the 'reasonable satisfaction of the highway authority'; the undertaker will be responsible for maintenance for 12 months following completion; and the new or altered street 'must… be

		maintained …. at the expiry of that [12 month] period by and at the expense of the highway authority', unless otherwise agreed between SZC Co and the highway authority. Further details of the types of agreements which may be entered into are then set out in Article 21. Articles 20 and 21 are similar to those included in the Hinkley Point C Development Consent Order and it is expected that they will be used in a similar way for the Sizewell C Project. Therefore, in practice, highway works at the Sizewell C Project will be carried out pursuant to agreements made with the highway authority under Article 21. These agreements perform the same role as agreements made pursuant to section 278 and section 38 of the Highways Act 1980, documenting the agreed specification of the works in detail and the sign-off process for the carrying out of the works. In this way, what constitutes the completion of the highway works 'to the reasonable satisfaction of the highway authority' is captured and documented, such that it is clear when the 12 month maintenance period commences prior to adoption by the highway authority. At Hinkley Point C, such agreements have been based on an amended version of the highway authority's standard section 278 agreement and include the usual provisions typically included in such an agreement, including provision for: (i) approval by the highway authority of the detailed design and specifications for the highway works and approval of a programme of works; (ii) arrangements for any required traffic regulation orders to be obtained and for the undertaker to be responsible for the highway authority's costs associated with those; (iii) a performance bond to be put in place before works commence, and associated step-in rights for the highway authority in the event that the undertaker is in default under the agreement; (iv) monitoring and supervision by the highway authority of the works (including safety audits and the production of a health and safety file); (v) the usual indemnities in favour of the highway authority against claims arising out of the execution or use of the works;

		(vi) payment of a commuted sum for ongoing maintenance costs post-adoption (where applicable); (vii) arrangements to provide evidence of compliance with Construction (Design and Management) Regulations 2007 and for the undertaker to be responsible for such compliance; (viii) the issuance by the highway authority of a Certificate of Completion where it is satisfied the works have been completed in accordance with the terms of the agreement; and (ix) a minimum 12 month maintenance period and provision for a Final Certificate to be issued once the relevant requirements under the agreement have been met (following which the highway works become maintainable by the highway authority).
	SCC Comment	**SCC's position as regards taking on the responsibility for maintenance of new highways is evolving and SCC is suggesting protective provisions as regards highways matters, so its replies are subject to that. Please see SCC's response to CA.1.67 on this point. In summary, SCC considers the regime proposed under article 21 (agreements with street authorities) of the dDCO is unsatisfactory and, to best protect its position, considers protective provisions should be included in the dDCO at Schedule 18 (protective provisions). SCC will shortly share its proposed protective provisions with the Applicant for their comment / approval.** **SCC notes the Applicant's response and (a) still considers that the descriptions of the relevant highway works could make clearer that they are indeed to be highways and (b) still considers that the Applicant's maintenance period should be 24 months, or to the end of the construction period (whichever is longer) would be appropriate.** **As before, SCC's responses are without prejudice to its contention that the SLR should be a temporary road (and therefore possibly not a highway at all).**
DCO.1.34	ExQ to the Applicant, SCC	Art 22(5)(b). In line with the ExA's earlier comments on identifying authorities by reference to function rather than name, the ExA invites the Applicant and SCC to consider whether it would be better to specify the capacity (e.g. highway authority if that is the case) in which this power is to be exercised
	Applicant Response	See Appendix 14A - DCO Drafting Note 1.

	SCC Comment	**See SCC's previous response and its response in relation to DCO 1.6. SCC does not consider that referring to SCC "in its capacity as local highway authority" is necessary, and it does not reflect the reality of the situation.**
DCO.1.54	ExQ for the Applicant, the Host Authorities	Art 83 and Sch 23 – procedure for approvals, consents and appeals. (i) The ExA invites comments in general on Sch 23 from the Host Authorities who will be the recipients of most applications and appeals to which Sch 23 will apply. (ii) Parties to which the deemed consent provisions in the Articles of the dDCO apply are also invited to comment on Sch 23, and their attention is drawn to the EM para 9.25 and following. (iii) In para 1(2) of Sch 23, there are two different time periods for discharge of requirements depending on whether consultation is necessary. The shorter period, 5 weeks, is shorter than the period specified in the model Sch at Appendix 1 of the Inspectorate's Advice Note 15. Whilst the ExA note the Applicant's more generous 8 week period in consultation cases, what is the justification for taking a week off the standard period? (iv) Fees. The ExA notes that there is no drafting at present and that the Applicant hopes to cover these with a performance or s.106 agreement. Until such time as that is concluded satisfactorily, the ExA would prefer to see drafting on fees in the dDCO. Please will the Applicant insert in the next draft of the dDCO the wording to be found at Sch 2 Part 2 para 3 of the Northampton Gateway DCO as made, (2019/1358). The ExA is not, by requiring this, expressing any view as to the desirability or fairness of those provisions. Please will the Applicant explain why para 3(11) of Sch 23 which reads: "the appointed person must have regard to Communities and Local Government Circular 03/2009 or any circular or guidance which may from time to time replace it" refers to Circular 03/2009 rather than "the Planning Practice Guidance published by the Department for Communities and Local Government on 6th March 2014 or any circular or guidance which may from time to time replace it" which is the wording in Appendix 1 of AN15?
	Applicant Response	i) Not for the Applicant. ii) Not for the Applicant.

		iii) Para (1)(2)(b) has been updated to allow for six weeks as per the model schedule at Appendix 1 of Advice Note 15. iv) Council resources will be included in the next revision of the draft Deed of Obligation which will be submitted at Deadline 3 so it is not considered necessary to add fees-related drafting to the draft DCO. To confirm, in revision 3 of the draft DCO [AS-143] the reference to Circular 03/2009 was replaced with reference to the Planning Practice Guidance.
	ESC's response	i) ESC has a number of comments to raise in relation to Schedule 23 [AS-143], as follows: 1(2)(b) is considered unnecessary as, as far as ESC is aware, there is never a situation in which a body does not have to consult further. If the Applicant considers that this is necessary, ESC would welcome an explanation of when such a situation would arise. 2(1): ESC considers it important that it is explicitly set out within this Schedule that it is not confined to being able to ask for further information just once and would invite the Applicant to make an appropriate change to 2(1) in response to this concern. 2(2): 7 working days is considered too short a period, and shorter than the proposed period in Advice Note 15 which advises 10 business days. ESC considers that 10 working days would be more appropriate. 2(3): 3 working days is considered too short a period, in particular as this does not even cover a full working week when the relevant person may be on leave or not working; ESC considers that 10 working days would be more appropriate. 3(2)(d) and (e): 10 working days is considered too short a period, and shorter than the proposed period in Advice Note 15 which advises 20 business days. ESC considers that 20 working days would be more appropriate. (ii) ESC has commented under (i) above. (iii) ESC has provided a comment on this under (i) above. (iv) ESC agrees that reference to fees ought to be made within Schedule 23 and considers that it would be appropriate for Schedule 23 to cross refer to the section 106 agreement to the extent that it relates to staffing

		costs for the discharge of requirements. ESC would welcome the Applicant providing some wording in this regard.
	SCC Comment	**SCC supports the general points made by ESC to this question and reserves its position on those points until the Applicant's response to those not addressed has been considered.** **The Applicant has not responded to questions (i) and (ii).** **(iii) In its response to the question, ESC (supported by SCC) consider that paragraph 1(2)(b) of Schedule 23 is unnecessary, and sought an explanation. SCC reserves its position until a response from the Applicant is made and considered, but in the meantime notes the alteration made to paragraph 1(2)(b)(i) and (ii) of Schedule 23, extending the decision period from 5 weeks to 6 weeks, in line with Advice Note 15.** **(iv) SCC reserves its position on fees until it has considered the next version of the draft deed of obligation, mentioned by the Applicant.** **SCC welcomes the alteration that has been made to paragraph 2(2) extending the period for requesting further information from 7 to 10 working days, in line with Advice Note 15.** **SCC notes the changes made to paragraph 2(3). It would like an explanation as to these changes. The DCO places duties on the discharging authorities to consult other bodies under Schedule 2 (for example, in requirement 3(1), SCC must consult Historic England before approving a written scheme of investigation). The changes to paragraph 2(3) appear to require the undertaker (rather than the body carrying out the consultation) to issue the consultation, which seems unusual. The changes also appear to have removed any reference to requests for further information by the requirement consultee, so the revised sub-paragraph (3) does not now sit easily in paragraph 2.** **SCC considers that the discharging authority should carry out the consultation, though the time limit of 3 days for the consulting body to issue the consultation should be increased to 10 days as in the previous draft of the DCO.**

DCO.1.66	ExQ to the Applicant, SCC	Sch 1 Part 1, Work No. 9, para (b). Is reinstatement of the A12 alignment in some 60 years time the appropriate course? Or does "operational use" refer to use of the Northern park and ride? If the latter, some clarificatory wording would seem sensible.
	Applicant Response	This is intended to refer to cessation of the operational use of the Northern park and ride site. Clarificatory drafting has been added to Rev 4.0 draft DCO (Doc Ref. 3.1(C)).
	SCC Comment	**The Applicant's response says that, in Sch 1 Part 1, Work No. 9, para (b), the words "operational use" refer to use of the Northern park and ride and that "Clarificatory drafting has been added to Rev 4.0 draft DCO (Doc Ref. 3.1(C))".** **Based on the Rev 4.0 draft DCO published in the Examination Library, this drafting has not been included in Sch 1 Part 1, Work No. 9, para (b).**
DCO.1.69(v)	ExQ to the Applicant, ESC	Sch 1 Part 2, Other Associated Development. The Works in Sch 1 Part 2 may be carried out during both the construction period and the operational period which is some 60 years. They apply also to maintenance. Many of them are works which would normally require planning consent. For example para (b) would allow new drainage systems; (c) allows stacks and chimneys; (i) allows new amenity buildings; (i) also allows "associated structures and plant; and (i) also allows associated post-operation phase work" without stating with what they are to be associated (the postoperation phase is presumably some 60-70 years hence and includes the decommissioning phase); (k) allows extensive alterations to highways; (n) includes habitat creation; (o) includes works for the protection of land or structures; and (p) allows "such other works as may be necessary or expedient" for construction, operation and maintenance (with a reference to environmental effects). (v) Please will the Applicant supply a reconciliation of the works described in Sch 1 Pt 2 with the development assessed in the ES?
	Applicant Response	See Appendix 14B - DCO Drafting Note 2.

	SCC Comment	**The ExA will need to be satisfied that the works set out in Part 2 of Schedule 1 have been assessed. SCC notes the contents of DCO Drafting Note 2[1] and has considered the content of Part 2 of Schedule 1 against the documents referred to in paragraphs 5.2.1 to 5.2.8 of DCO Drafting Note 2. It is not clear to SCC that the works referred to in sub-paragraphs (g) concerning marine works and (n) concerning habitat creation and management have been assessed and SCC would welcome the Applicant's confirmation on these points. SCC also looks forward to hearing the Applicant's response to ESC's suggestion that certain works listed in Part 2 of Schedule 1 should be their own numbered work and others would only apply to specific works rather than any of them.**
DCO.1.73	ExQ to the Applicant, ESC	Schedule 2 para 1(3). This paragraph is relevant to approvals of details or documents under a requirement "where compliance with a document contains the wording "unless otherwise agreed" by the discharging authority". The approval is not to be given unless the changes or deviations have been demonstrated to the discharging authority not to give rise to "any materially new or materially different environmental effects to those assessed in the environmental information". Environmental assessment is a process which assesses not effects but projects to see what significant effects the project is likely to have. (i) Why is comparison with assessed effects relevant? Those effects will include things found to have various degrees of significance, which may then have been mitigated by for example secondary or tertiary mitigation. (ii) Should the assessment instead be against the position at the time of seeking the "unless otherwise agreed" - the baseline may have changed by then. If there is to be a comparison with the current assessment, or the assessment after mitigation, what is the appropriate documentation against which the comparison should be made and how is it to be identified and accessed? (iii) How is the decision on effects to be taken? Could the "subsequent application" approach in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017/572 be applied by the DCO to the approvals addressed by para 1(3) of Sch 2 and provide a suitable procedure? The ExA notes that the subsequent approvals process incorporates a screening process so as to weed out matters not needing EIA.

[1] [REP2-111] Applicant's Responses to the ExA's First Written Questions (ExQ1), Volume 3 – Appendices, Part 4 of 7 (Appendix 14B).

	Applicant Response	See Appendix 14E - DCO Drafting Note 5. It should be noted that in considering its response to this question, the Applicant has decided to remove the drafting at Schedule 2, paragraph 1(4) as it is not considered necessary. This is because the Applicant has factored in to the parameter heights for all buildings and structures an allowance for all necessary external projections, and these parameters have been used for the purposes of carrying out the environmental assessment. Notwithstanding this, the Applicant sets out below information in response to the ExA's questions which is hopefully helpful. The construction of the approved buildings or structures, including their design, size and location, is regulated and constrained by Requirements which also apply to external projections. These include, in particular: • R11 (Main development site: Approved buildings, structures and plant). This requires the relevant numbered works to be carried out in accordance with the Approved Plans (including elevations and roof plans). Detailed designs for approximately 65 buildings and structures within the main development site have been submitted for approval. Any external projections on those buildings and structures would need to be in accordance with those Approved Plans. In addition, R11 requires those same numbered works to be carried out in accordance with the detailed design principles in Chapter 5 of the MDS DAS (Doc Ref. 8.1Ad2(A)). • Authority. The details must accord with the detailed design principles in Chapter 5 of the MDS DAS (Doc Ref. 8.1Ad2(A)) (see above). • R13 (main development site: Ancillary structures, other building and plant). This requires the relevant numbered works to be carried out in general accordance with the detailed design principles in Chapter 5 of the MDS DAS (Doc Ref. 8.1Ad2(A)) (see above). • R 17 (Accommodation campus: Buildings and structures). This requires the relevant numbered works to be carried out in general accordance with the detailed design principles in Table A.1 of the MDS DAS (Doc Ref. 8.1Ad2(A)) (see above). Although these principles do not specifically control the provision of plant, an area of plant is provided within the service area located to the rear of the recreation building, thus making it unlikely that any significant plant would need to be provided on the exterior of the proposed buildings themselves. • R20 (Associated development sites: Buildings and structures). This requires Work No. 9 (northern park and ride), Work No. 10 (southern park and ride) and Work No. 13 (freight management facilities) to be carried out in accordance with the relevant Parameter Plans and Approved Plans, and in general accordance with the relevant sections of the Associated Development Design Principles (Doc Ref. 8.3(A)). These three AD sites are the ones that will have buildings and the

		parameters for their dimensions, including heights, are stipulated on the for approval general arrangement and parameter plans. The heights secured by the Requirements summarised above have been assessed in the relevant chapters of the ES and can be found in the descriptions of development – please refer to the DCO Signposting Document (Doc. Ref. 3.4(B)).
	ESC's Response	(i) ESC considers that with this provision the Applicant is appropriately trying to limit the amount of changes that can be made to the authorised development once consented, however ESC agrees that the wording is perhaps not as clear as it could be. The provision is intended to mean that any approvals given can only be given to activities within the scope of the environmental assessment [AS-143]. ESC suggests the following wording would be more appropriate: (3) Where an approval of details or other document is required under the terms of any requirement or where compliance with a document contains the wording "unless otherwise agreed" by the discharging authority, such approval of details or of any other document (including any subsequent amendments or revisions) or agreement by the discharging authority is not to be given except in relation to changes or deviations where it has been demonstrated to the satisfaction of the discharging authority that giving such approval would not give rise to any materially new or materially worse adverse environmental effects in comparison with those reported in the environmental statement." (ii) It is not considered appropriate for the authorised development to be subject to an ongoing assessment which compares any potential new effects to a changing baseline. The future changing baseline is taken into account in the ES: the ES assesses the likely significant effects of the authorised development and predicts the expected changes to the baseline in the cumulative effects section. (iii) ESC would welcome an approach to subsequent approvals similar to that set out in the Northampton Gateway Strategic Railfreight Interchange DCO, as made. In particular, Article 44 of that DCO gives clarity to the process for subsequent approval under the Requirements. It makes it abundantly clear what can and cannot be given approval, and it references an appropriate procedure within Schedule 2 'Requirements' for applying for and obtaining such approval. ESC notes that Schedule 23 of the draft DCO appears to be an attempt on behalf of the Applicant to set out a similar procedure, but ESC would welcome the Applicant reviewing this procedure in light of the
	SCC comment	**SCC has considered the Applicant's and ESC's replies to DCO.1.73 and considers ESC's proposed revisions to Schedule 2 para 1(3) should be adopted by the Applicant. SCC also agrees with ESC's reply to DCO.1.73(iii).**

DCO.1.75	ExQ to the Applicant, ESC	Art 1(5). Is not the default meaning for the phrase "commencement of development" rather counterintuitive? Please will the Applicant consider reverting to the position that the phrase means commencement of any part of the Proposed Development? This would be consistent with the definition of "commence" in Art 2 of the dDCO. Please will ESC also consider and comment?
	Applicant Response	The drafting at Schedule 2, paragraph 1(5) is not introducing a different definition of 'commencement' but rather it is explaining for the avoidance of doubt that in Schedule 2 (Requirements) where there is a pre-commencement requirement which applies (or can apply) to a specific site or Work No. then references to 'commencement' of development are to commencement of development of that specified site or work only. The purpose of this is to enable the discharge of pre-commencement requirements on a site-by-site basis. This is reasonable given the scale and nature of the Sizewell C Project and avoids details having to be submitted in respect of the whole authorised development when works are commencing in respect of a work or part of a work only. The Explanatory Memorandum (Doc Ref.3.2(B)) at paragraph 10.15 explains this in the following terms: "As the requirements often apply to several Works, the undertaker has the ability to discharge requirements in parts. The discharge of a certain requirement may be required at different times for different Works through the construction programme as new information is delivered and the construction progresses. This allows the undertaker to prioritise discharging certain parts of requirements at the correct time in the construction programme."
	ESC Response	ESC agrees with the ExA that this seems to be an inconsistent approach and would welcome an appropriate change to be made to 1(5) of Schedule 2 [AS-143] so that it states: "Unless otherwise provided in this Order, where a requirement relates to a specific site or Work and it specifies "commencement of development", it refers to the commencement of development of the authorised development." ESC would then expect to see, in line with the wording precedented in other DCOs, that certain requirements then refer more specifically to commencement of development for certain works.

	SCC comment	**SCC notes the Applicant has decided not to amend paragraph 1(5) of Schedule 2 in accordance with the ExA's suggestion.** **SCC agrees with ESC's response on the changes that should be made to paragraph 1(5) of Schedule 2.**
DCO.1.76	ExQ to the Applicant, ESC	R2 and (in Revision 1) R3 both refer to "removal and reinstatement" of the authorised development. Whilst this is so as to regulate such matters, what is "removal and reinstatement" this intended to cover?
	Applicant Response	Requirement 2 has been updated to clarify which works 'removal and reinstatement' relate to.
	SCC Comment	**The Applicant's response states "Requirement 2 has been updated to clarify which works 'removal and reinstatement' relate to" and R2 now states –** **"The construction, of the authorised development and the removal and reinstatement of the temporary works must be carried out in general accordance with the Code of Construction Practice, unless otherwise approved by East Suffolk Council".** **For the avoidance of doubt, SCC considers R2 needs to explain what "the temporary works" refers to. For instance, is it meant to cover each of the temporary works set out in Part 1 of Schedule 1 or something else?**
DCO.1.87	ExQ to the Applicant, ESC	(i) It seems to the ExA that the implementation of the landscape and ecology works could be avoided simply by failing to submit the landscape scheme. Should not the prohibition on commencing the landscape works be changed to a prohibition on commencing the authorised development? (ii) Is this the Requirement referred to at para 7.1.2 of the oLEMP [APP-588]?
	Applicant Response	Requirement 14 relates solely to the landscape and ecology implementation and maintenance of the operational power station site. Requirement 14 has been updated to require the landscape scheme to have been submitted for approval by ESC within 6 months of Unit 1 commencing operation. The landscape and ecology scheme must be carried out as approved. Yes, Requirement 14 is the requirement referred to at para 7.1.2 of the oLEMP [APP-588] (note now updated by [REP1-010]).

	SCC Comment	**(ii) SCC is surprised by the Applicant's reply to D1.87(ii). Para 7.1.2 of the oLEMP [APP-588] says –** **"An Ecological Steering Group will be established prior to the main development site landscape works commencing in order to advise on the management measures that would be specified within the LEMP. This is secured by a requirement in Schedule 2 of the Draft DCO (Doc Ref. 3.1) relating to the detailed landscape scheme. It should be expected that this group will merge into the Operational Management Group after completion of the landscape works".** **SCC does not consider R14 can be the requirement mentioned in para 7.1.2 of the oLEMP, not least since no mention of an Ecological Steering Group in made in R14 (or in Chapters 5 or 8 of the Main Development Site Design and Access Statement) [APP-585 and APP-586).**
DCO.1.91	ExQ to ESC, the Applicant	R18. Please will ESC say whether or not they consider the documents referred to in this requirement to be (a) adequate and (b) the full suite relating to this aspect in the Application documents? Are the parts referred to correct? Please will the Applicant list the "relevant sections" of the Associated Development Design Principles and set them out in this requirement in the next version of the dDCO?
	Applicant Response	Requirement 18 has been updated to refer specifically to the tables in the Associated Development Design Principles (Doc Ref. 8.3(A)).
	ESC response	(a) Yes. (b) Yes, ESC considers this to be the full suite. The parts referred to are correct.
	SCC comment	**This question is not directed at SCC but its views are as follows.** **There are important issues related to the crossing of the rail line by highways. While the discharge of requirements will be by ESC, after consultation with SCC, the Council is concerned that the initial plans should be suitable.**

		Dwg 100017 Rev 2 – there is a security footbridge located east of Abbey Road Level Crossing – what is the height (6m+?) and what are the impacts? **DWG SZC-SZ0204-XX-000-DRW-100133 Rev 2 and 100183 Rev 2 both show the diverted right of way to the southwest of Buckleswood Road to be tightly constrained by security fencing. This will not enhance the amenity value of the route and may impede maintenance activities.** **SZC-SZ0701-XX-00-DRW-100185 Rev 2 implies drainage west of Abbey Road is not retained nor replaced after the Green Rail Route is removed.** **SZC-SZ0204-XX-000-DRW-100133 Rev 2 does not show the line of the existing Footpath 003 nor does SZC-SZ0701-XX-00-DRW-100185 Rev 2 show its reinstatement.** **The drawings do not contain details of the level crossings on Abbey Road and Buckleswood Road. While much of this can be agreed in during detailed design the Applicant should evidence that the red line boundary contains sufficient land to provide the required visibility for each crossing, including vegetation clearance or trimming as necessary. At this stage it is sufficient in the Councils view to indicate the type of barrier to be installed at each crossing and that on Station Road. It is presumed that the existing hand operated gates will be upgraded to automated barriers (works 4C).** **Schedule 7 does not include reference to the works on the Leiston Branch nor the East Suffolk Line although Requirement 18 (1) refers to Works No. 4 (Rail works) so the presumption is that this includes the Leiston Branch Improvements (Works No. 4C). In the Council's view the drawings relevant should be contained within Schedule 7.** **Construction of the Leiston Branch Line forms part of the Off-site Associated Developments and is controlled by Part C of the Code of Construction Practice. SCC would request it is consulted during discharge of this management plan to ensure the authority can advise on matters under its jurisdiction such as Archaeology and Transport. Of particular interest to the Council will be the access arrangement for the level crossing improvements, construction compounds and details of traffic associated with the works.**
DCO.1.95	ExQ to ESC	R21. Please will ESC say whether or not they consider the documents referred to in this requirement to be the correct documents?

	ESC Response	In the current version of the dDCO [AS-143] this requirement refers to Work No 1D (g) (outage car park), whereas the reference should be to Work No. 1D (e) (outage car parking spaces). 1D (h) (related highway works), should be Work No. 1D (I) (outage car park access roads). Work No. 13 is not divided into (a) and (b) so R21 needs revision.
	SCC Comment	**SCC considers that several cross-references in R21 are incorrect. For instance, R21(1) refers to –** • **"Work No. 1D(g) (outage car park)", but in Sch. 1 Work No. 1D(g) refers to "administrative buildings to include workshops, civils store, office accommodation and general store";** • **"Work No. 1D(h) (related highway works)", but in Sch. 1 Work No. 1D(h) refers to "storage, canteen, and welfare facilities"** • **"Work No. 13(b) (related highway works") but, in Sch. 1 Work No. 13(b) refers to "internal access routes".** **These cross-references need to be corrected.**
DCO.1.96	ExQ to ESC	R22. Please will ESC say whether or not they consider the documents referred to in this requirement to be (a) adequate and (b) the full suite relating to this aspect in the Application documents? Are the parts referred to correct? Please will the Applicant list the "relevant sections" of the Associated Development Design Principles and the relevant plans / details in Sch 7 and set them out in this requirement in the next version of the dDCO?
	Applicant Response	Requirement 22 has been updated to detail the relevant tables within the Associated Developments Design Principles (Doc Ref. 8.3(A)). Schedule 6 and 7 list the plans by the name of the site that they are related to. These match the names of the works referred to Schedule 1. Schedule 7 has been updated to also refer to the work numbers to provide extra clarity.
	ESC Response	(a) Yes. (b) ESC does not consider these to be correct: Reference should be made to: • 11 A – C (Two Village Bypass), 12 A – D (Sizewell Link Road)

		• 13 (f) is currently correct but will be wrong if revisions are made to R21 as per answer to DCO.1.95 above • o 14 A - B (Yoxford roundabout).
	SCC Comment	**This question is listed for completion by ESC but relates to highway provision and the requirement is for discharge by SCC. As Local Highway Authority, SCC is working with the Applicant, in consultation with ESC, to reach agreement that the relevant plans have been set out in Schedule 7 and the agreed details are reflected in revisions to these plans. Work is continuing on this.**
DCO.1.129	ExQ to SCC, the Applicant	At para 8 of [RR-1175] SCC set out a list of funds they submit should be considered. Are they accepted by the Applicant and where are they secured? Please will SCC and the Applicant comment on which funds are appropriate and whether and how this would meet the legal tests for valid planning obligations. Are the policy tests also met?
	Applicant's response	All of the funds and financial contributions which the Applicant considers appropriate and necessary are secured through the draft Deed of Obligation (Doc. Ref. 8.17(C)) and are summarised in Annex 2 of the draft Deed of Obligation (Doc. Ref. 8.17(C)). As explained in the SA.1 Response Paper (Appendix 26A), the Applicant no longer proposes to enter into development consent obligations pursuant to section 106 of the Town and Country Planning Act 1990. See Section 10 of the SA.1 Response Paper (Appendix 26A) in respect of the relevance of the NPS policy tests in respect of nondevelopment consent obligations. The scale and scope of the funding to be provided are subject to further development and ongoing discussions with the Councils. These matters would impact upon the satisfaction of the policy tests and no definitive statement can be provided at this stage. However, the Applicant is confident that the proposed payments once finalised will be compliant with policy. The Applicant intends to set out its analysis of the satisfaction of the policy tests in the Explanatory Memorandum and has set out its proposed structure for doing so in the updated draft of this document. All of the funds listed by SCC are accepted by the Applicant in principle and secured by the Deed of Obligation (Doc Ref. 8.17(C)) save for: • Levels of funding and the scope of each fund is subject to further discussion and negotiation with the local authorities. • It is not agreed that the Natural Environment Improvement Fund shall be provided throughout the operational and decomissioning phases of Sizewell C. The Applicant does not consider that such an extension to the lifetime of the proposed Fund would satisfy the policy tests for obligations set out in National Policy Statement EN-1 (at paragraph 4.1.8). No significant adverse

		effects requiring mitigation through the continuation of the Fund have been identified for terrestrial ecology and ornithology during the operational phase [AS-033]. Significant adverse landscape and visual effects have been identified during the operational phase [APP-216]. However, the Applicant considers that all reasonably practicable mitigation measures have been embedded into the scheme and that the scope for additional mitigation through the extension of the funding period for the Fund is limited. Given the limited scope for measures funded by the Natural Environment Improvement Fund during the operational period to mitigate the assessed effects, the Applicant considers that SCC's proposal that the Applicant continues funding the Natural Environment Improvement Fund throughout the operational phase is neither fairly nor reasonably related in scale to the proposed development. Instead, it is considered reasonable that funding be provided for the first three years following the receipt of fuel at Unit 2. • Whilst the Applicant proposes to provide funding towards a Wickham Market Improvement Scheme and a Leiston Improvement Scheme to address transport impacts, it is not considered necessary or reasonable that such funding is unlimited in scale. The scale of the funding shall be based upon an estimate of the cost of the schemes to be delivered and include a reasonable contingency towards possible cost overruns. • Whilst the Applicant has proposed contributions towards the increased highway maintenance costs of Suffolk County Council resulting from construction traffic using the B1122 prior to the opening of the Sizewell link road, no similar contributions are considered necessary or reasonable in respect of the A12 or other local roads.
	SCC Comment	**With regard to Deed of Obligation, please see the Council's response to DCO.1.26.** **The agreement of the mitigation funding remains a matter of discussion between the parties. SCC has sought to apply the legal tests so that they are necessary to make the development acceptable in planning terms. directly related to the development; and fairly and reasonably related in scale and kind to the development. Although the Council remains flexible in its approach to securing the funding it considers this is best achieved through the s106 agreement with the Applicant.** **Specifically regarding the Natural Environment Improvement Fund, SCC maintains the view set out in its Relevant Representation [RR-1175] and in the Local Impact Report [REP1-45] that the Natural Environment Improvement Fund should be provided throughout the construction and operational, and possibly also decommissioning, phases of Sizewell C, and considers that maintaining the proposed Fund throughout**

		construction and operation does satisfy the policy tests for obligations set out in National Policy Statement EN-1. **The LIR sets out in some detail (in para 6.35-6.53 and 7.7-7.13) the adverse impacts on the natural environment and the AONB during the operational phase. The LIR considers that, in terms of negative impacts during the operational phase, "the buildings which comprise the Main Development Site will result in a significant and lasting adverse residual impact on the character and special qualities of the AONB within the locality of the main site. Furthermore, this will have an adverse impact on the purposes of the designation that is, to conserve and enhance natural beauty of an area as set out in s82 of the Countryside and Rights of Way Act 2000. This impact is intrinsic to the proposal due to the operational requirements of a new nuclear power station." (para 6.34) The Councils, in the LIR, consider "the impact on the coastal aspects of the designations to be significantly adverse" (para 6.38). The design of the nuclear domes, being inferior to the iconic design of Sizewell B, and the proposed addition of pylons further add to this adverse impact, as set out in para 6.44-6.53.** **Specifically related to the AONB special qualities, which are wider than landscape and scenic quality, the Councils consider in the LIR, during construction and operation, "large and medium scale effects likely for all the indicators of Natural Beauty and Special Qualities, some at a localised level, others affecting a wider area." (para 7.8) The Councils "consider this list of effects on AONB special qualities suggest a risk of significant *impacts on the AONB and the purpose of the designation,* a risk that has been identified in the site nomination material within EN-6 Vol II." (para 7.11)** **SCC considers mitigation options to be limited, resulting in significant residual impacts on the landscape and AONB. Whilst it is accepted that during the construction phase the impacts on the natural environment will be even greater than during operation, this should not deflect the still significant impacts during operation. Therefore, and taking into account the location of Sizewell C within the AONB, SCC considers that a Natural Environment Fund for the lifetime of the power station is both relevant and necessary to make the proposed development acceptable in planning terms, and is fairly and reasonably related in kind to the proposed development, and therefore meets the policy tests in para 4.1.8 in NPS EN-1. It is noted that the scale of the Natural Environment Fund is still subject to discussion with the Applicant.** **It is worthwhile to note that, in the decision making for the application of the Sizewell B Dry Fuel Store in 2011, approved by the then Department of Energy and Climate Change under Section 36 of the Electricity Act 1989, the harm on the AONB over the lifetime of the dry fuel store was recognised, and a fund (the**

		Amenity and Accessibility Fund) over the lifetime of the facility was agreed to be set up as part of the consent. The objective for this fund was defined as: "To offset the impact caused by the delay of part of the release of the Sizewell B site by funding works to improve the amenity and accessibility of the AONB and Heritage Coast within the locality of the Development and its wider environs." This is a useful precedent, indicating that for that consent, a fund over the lifetime of the facility was considered relevant in planning terms.
6. Flood Risk		
FR.1.52	ExQ to the Applicant	Outline Drainage Strategy (ODS) [APP-181] Paragraph 3.4.13 Explain: (i) How surface water runoff from the main construction area will be conveyed both to Water Management Zone (WMZ) 1 and WMZ2; (ii) Identify which attenuating features in WMZ1 need to be sized accordingly and how that analysis will be undertaken.
	Applicant Response	(i) Surface water runoff from the main construction area is no longer proposed to be conveyed to Water Management Zones 1 and 2. This option has been superseded by the proposal to install a temporary marine outfall that will allow early surface water runoff from the main construction area to be discharged to the sea. The temporary marine outfall is proposed to be installed early in the construction programme, as a redundancy measure or a precautionary principle for discharging surface water to sea, prior to the commissioning of the Combined Drainage Outfall (CDO). During this period, management of surface water run-off and discharge is required to prevent flooding of the Main Development Site (MDS), and any adverse effects on the nearby Sizewell Marshes Site of Special Scientific Interest (SSSI) and Minsmere South Levels. For a period of 15 months or so, the temporary marine outfall would principally be used where factors external to the MDS that are out of the control of Sizewell C result in the Sizewell Drain being unsuitable to discharge to, for example, flooding on site caused by off-site flood conditions. The temporary outfall will be controlled through conditions set by the Environment Agency through discharge permit applications. Once the CDO is installed, the temporary marine outfall will no longer be required, and will be removed.

		The Outline Drainage Strategy (Doc Ref. 6.3 2A(A)) has been revised to specifically answer the Examination Authority's questions FR.1.51, FR.1.53, FR.1.56 and FR.1.57(i). The Outline Drainage Strategy (Doc Ref. 6.3 2A(A)) has been updated to include the role of the temporary marine outfall. (ii) As stated in the text above to part (i), the WMZ1 attenuation features are not sized to allow conveyance of surface water from the main construction area (MCA) to WMZ1/2. The WMZ1 attenuation basin has been sized for the WMZ1 catchment, for a 1:100 year, 24 hours storm event including an allowance for climate change, checking the worst case scenario for several rainfall models including FEH1999, FEH2013 and the Flood Studies Report (FSR). The attenuation basin provides a storage of approximately 17,300m3 .
	SCC Comment	**SCC awaits details of how surface water is proposed to be managed for the Main Development Site & Associated Development Sites. Until these details are received, it is not possible to make any further comment on the Applicants response. The principles contained in the updated Outline Drainage Strategy (REP2-033) are noted, but further details and supporting information are required.** **Parameters for the use of the temporary marine outfall need to be clearly identified and justified with supporting evidence to prevent impacts on the nearby sensitive environment.**
FR.1.53	ExQ to the Applicant	Main Development Site FRA Addendum [AS-157]- Temporary Outfall Provide an updated Outline Drainage Strategy that includes the role of the temporary outfall
	Applicant Response	The Outline Drainage Strategy (Doc Ref. 6.3 2A(A)) has been revised to specifically answer the Examination Authority's questions FR.1.51, FR.1.53, FR.1.56 and FR.1.57(i). The Outline Drainage Strategy (Doc Ref. 6.3 2A(A)) has been updated to include the role of the temporary marine outfall.
	SCC Comment	**The updated Outline Drainage Strategy (REP2-033) was only submitted as a 'clean version'. It was therefore not practicable to compare the changes made between this document and the original submission. As was the case for the updated Code of Construction Practice (REP2-056) that was submitted, SCC request that where changes are made to application documents, both tracked and clean copies are submitted to enable stakeholders to easily and clearly identify where changes have been made.** **SCC notes that the Outline Drainage Strategy has been updated to 'specifically answer the Examination Authority's questions'. As such, concerns previously raised by SCC with the Applicant regarding the content of the Outline Drainage Strategy have not been addressed. Further to this, some aspects of the updated**

		Outline Drainage Strategy are superseded by the Applicant's responses to the Examining Authority's questions. For example, REP2-033, paragraph 3.4.90 references the use of underground geocellular storage for LEEIE, which directly contradicts the Applicant's response to ExA Q FR.1.62 (REP2-100). **It is SCC's understanding 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, SCC will withhold further comment until these submissions have been made and we have had time to review the content in detail**
FR.1.61	ExQ to the Applicant	Outline Drainage Strategy (ODS) [APP-181] Table 3.7 Row 6 There is little description of the capacity and suitability of surface water drainage system referred to. Explain how its suitability has been assessed.
	Applicant's Response	At the time of writing the Outline Drainage Strategy [APP-181], full details of the Campus development proposal were unknown. A general design philosophy (in implementing sustainable drainage following the drainage hierarchy) was developed to indicate to designers the considerations that would need to be made to dispose of surface water appropriately in the area. As such, a full assessment of the capacity and/or suitability of the surface water system referred to in Table 3.7 row 6 was not undertaken at the time of writing. This is a requirement of the design process and is informed by the design philosophy within the Outline Drainage Strategy (Doc Ref. 6.3 2A(A)).
	SCC Comment	**See SCC response to FR.1.53**
FR.1.62	ExQ to the Applicant	Outline Drainage Strategy (ODS) [APP-181] Paragraph 3.4.82. Explain why underground geocellular storage is suitable for parts of the LEEIE and also how the necessary maintenance regime will be undertaken in the areas suggested for its use.
	Applicant's Response	The surface water drainage strategy for the Land East of Eastlands Industrial Estate (LEEIE) has progressed since the Outline Drainage Strategy (ODS) [APP-181] was submitted, following discussions with key stakeholders including Suffolk County Council and the Environment Agency. The updated LEEIE outline drainage strategy proposes to primarily convey and discharge surface water runoff from the LEEIE to the Sizewell Marshes. A second outfall is proposed to the Leiston Drain on Lover's Lane to discharge surface water runoff from the topsoil compound and area west of the topsoil compound within the LEEIE only (Catchment

		2). A technical note on the LEEIE basic drainage design will be shared with the ExA by Deadline 4 and will be shared initially with stakeholders in advance of this. The ODS will be amended accordingly in a future strategy update. The recent drainage design development has eliminated the need for below ground geocellular storage tanks and therefore is no longer proposed. In subsequent design stages, the surface water drainage design will consider the use of other SuDS and optimisation of the network. The submission and approval of surface water drainage details prior to commencement of that part of the authorised development are required by Schedule 2, Requirement 5 of the draft DCO(Doc. Ref. 3.1(C)).
	SCC Comment	**See SCC response to FR.1.53**
FR.1.69	ExQ to the Applicant	Outline Drainage Strategy (ODS) [APP-181] East Suffolk Council [RR-0343] express concern that the ODS does not at this stage demonstrate that appropriate sustainable drainage systems can be implemented at all sites. Comment on the level of certainty that can be attributed to the total implementation of sustainable drainage solutions for the Proposed Development.
	Applicant's Response	SZC Co. has provided a standalone response to FR.1.69 as Appendix 15C which sets out how sustainable drainage systems can be implemented and the level of certainty attributed to SZC Co.'s approach.
	SCC Comment	**SCC shares East Suffolk Council's concern. The concern primarily relates to whether sufficient space has been allocated to accommodate SuDS, in the worst-case scenario. This worst-case scenario includes, but is not limited to, rainfall events, infiltration rates, discharge rates, impermeable areas etc. In order for the Applicant to demonstrate that SuDS can be provided, in the worst-case scenario for all sites, further information will be required than what is contained in the response to FR.1.69 (REP2-108). This further information should include, but is not limited to, design assumptions, 'source control' calculations, results of infiltration testing, greenfield runoff calculations (where applicable), plans and sections of proposed SuDS components, accompanied by a technical note to explain the surface water design development up to this stage.**

		Whilst SCC does not wish to challenge the information contained in the Applicants response to FR.1.69, it does not address the concern shared by the Councils. However, SCC notes that further details on surface water drainage strategies for sites will be submitted at Deadline 3 or 4, as per SCC response to FR.1.53.
FR.1.70	The Applicant	Outline Drainage Strategy (ODS) [APP-181] East Suffolk Council [RR-0343] have queried whether suitable pollution control techniques will be implemented as part of the drainage solutions at the Associated Development sites. Explain how any runoff pollution will be dealt with as part of the sustainable drainage solution for those works.
	Applicant's Response	Before development on the relevant authorised development (including the Associated Development sites) can commence Requirement 5 of the draft DCO (Doc Ref. 3.1(C)) requires details of the surface and foul water drainage system for that part (including management and maintenance arrangements, means of pollution control, sewage treatment works and a programme of construction and implementation) to be submitted to and approved by East Suffolk Council, following consultation with the Environment Agency, the relevant Statutory Nature Conservation Body, the relevant Internal Drainage Board, the Lead Local Flood Authority and the drainage authority. The Outline Drainage Strategy (Doc Ref. 6.3 2A(A)) details in the tables for the individual Associated Development sites in Section 4 that the attenuation stage of the drainage strategy will provide treatment on site before infiltration to ground or discharge to a watercourse. Whilst the detailed drainage design is controlled by Requirement 5 of the draft DCO (Doc Ref. 3.1(C)), SZC Co. is preparing a set of technical notes to respond to queries raised by the LLFA and to back-up the indicative drainage plans (not for approval) submitted as part of the DCO. The aims of the technical notes would be to demonstrate: (i) that SZC Co. has a justifiable drainage solution that promotes SuDS / drainage hierarchy and meets surface water flooding requirements / parameters; (ii) that the highways drainage meets minimum design standards expected of that Authority; and (iii) that it can be accommodated within the existing Order Limits. For all sites within the Order Limits, Sustainable Drainage Systems (SuDS) have been prioritised in the surface water drainage proposals where possible to aid pollution control. SuDS techniques proposed provide flood reduction, pollution control and aim to mimic the existing drainage characteristics to prevent impact on the protected Sizewell Marshes Site of Special Scientific Interest and the South Minsmere Levels. The pollution and water quality risk are being assessed using the simple index

		approach as set out in Section 26.7.1 of CIRIA C753 SuDS Manual, to determine the effectiveness of the SuDS measures to treat different types of developments. In general, a sequence of natural treatment methods are proposed to build robustness within the drainage network by providing numerous options to initially treat runoff. In places where there is potential for increased risk of pollution or threat to receiving watercourses/sewers, proprietary systems are considered and may be used as a fail-safe method of treatment to supplement primary treatment observed using SuDS techniques. This will be explored further in future design stages on a risk management basis.
	SCC Comment	**See SCC response to FR.1.53.**
FR.1.71	The Applicant	Outline Drainage Strategy (ODS) [APP-181] Suffolk County Council [RR-1174] paragraph 125 state they have "not yet seen evidence that any of the surface water drainage infrastructure proposed to serve the Main Development Site, the Land East of Eastlands Industrial Estate and Associated Developments can be facilitated within the proposed red line boundaries to a satisfactory standard." Comment on whether the drainage design strategy being developed can provide the necessary reassurance to the Council.
	Applicant Response	The surface water design has so far been progressed to a developed design level (similar to RIBA stage 3), and the proposed strategy can sufficiently manage surface water runoff generated by the proposed development, within the Order Limits and whilst complying with current local and national guidance. Surface water drainage proposals across all development areas within the application boundary prioritise Sustainable Drainage Systems (SuDS) where possible and have been incorporated across the site in the form of swales, infiltration trenches, permeable pavements and infiltration / attenuation basins. The design so far has been prepared to account for the worst-case storage volumes required for each Water Management Zone basin across the Main Development Site. The design demonstrates that sufficient space will be provided within the order limits to ensure no surface water, other than at controlled greenfield runoff rates, will run off the site up to a 1:100 year storm including allowance for climate change. Similarly, the surface water drainage strategy for the Land East of Eastlands Industrial Estate (LEEIE) has progressed since the original submission of the ODS following discussions with key stakeholders including

		Suffolk County Council, Essex and Suffolk Internal Drainage Boards, East Suffolk Council, Natural England, and the Environment Agency. Surface water on site will be collected primarily using SuDS in combination with conventional drainage systems, to store, treat and discharge runoff to nearby watercourses at agreed rates. The surface water design improves the existing flood risk of the site by allowing systems to capture surface water runoff and attenuating this up to 1 in 100-year storm event, in accordance with national and local guidance. A similar approach will be undertaken for the Associated Development sites and will ensure that the proposed surface water drainage systems will adhere to the principle stated in the Outline Drainage Strategy (Doc Ref. 6.3 2A(A)).
	SCC Comment	**See SCC response to FR.1.53**
7. Health and Wellbeing		
HW.1.15	ExQ to the Applicant	Vulnerable Groups The CCG [RR-500] and Suffolk Constabulary [RR-1174] also raise the concern over potential exploitation of vulnerable groups. (i) What is proposed to be in place to mitigate this concern? (ii) How would it be secured?
	Applicant's Response	Response to (i) Please refer to the response to question HW.1.14 regarding mitigation for vulnerable groups. SZC Co. has been working closely with SCC and Suffolk Constabulary to appropriately consider the potential for effects on vulnerable groups – for example where there may be a greater risk of existing statutory service delivery, or where vulnerable people may be more at risk of experiencing effects (or experiencing effects in a different way) as a result of the Sizewell C Project. Key elements of the socio-economic mitigation package include measures to be secured through the DCO (such as the project accommodation) and through the Deed of Obligation (see Draft Deed of Obligation (Doc Ref. 8.17(C)). The latter includes:

		• a Housing Fund (supported by an Accommodation Management System) that supports the lower 30th percentile of the housing market in particular and provides safeguarding support (Schedule 3); • funding for Suffolk Constabulary to be able to appropriately respond to the additional effects on terms of crime and non-crime incidents related to the Sizewell C Project (Schedule 4); • a Public Service Resilience Fund, which focuses on the delivery of social care services and community safety activity (Schedule 5); • a contribution to school and early years capacity (Schedule 5); and • a Community Fund to be administered on behalf of the community to provide schemes, measures and projects which promote the economic, social or environmental well-being of communities and enhance their quality of life (Schedule 14). Response to (ii) Please see response to question CI.1.15 (in Part 3, Chapter 12) with regard to how measures will be secured.
	SCC Comment	**SCC agrees with [RR-500] and [RR-1174] that there is a concern over exploitation of vulnerable groups, and considers that mitigation needs to be provided in terms of preventative measures, monitoring capacity, and contingency measures. The principles of the funds proposed by the Applicant in their response are supported by SCC, although the size and governance of these funds have not yet been agreed with the Applicant. For community safety measures, please refer to the proposed action plans put forward by SCC and ESC in Annex N to the Local Impact Report [REP1-059], which is still to be agreed with the Applicant.**
HW.1.19	ExQ to the Applicant, Network Rail	Rail Safety Network Rail [RR-006] identifies concerns, that by introducing any Freight Trains onto the East Suffolk line will (due to their slower running speeds), cause an increased risk and delay to users of level crossings. (i) Please respond to this concern and advise if any mitigation could be provided to address this issue. (ii) If this were appropriate, how would it be delivered through the DCO?
	Applicant's Response	SZC Co. and Network Rail are working together to identify level crossings on the East Suffolk line where there may be an increase in risk. If mitigations are required, these will be pursued by Network Rail as the asset owner and organisation with responsibility for the management of safety risks at the level crossings.
	Network Rail Response	(i)A high-level review of impacts to level crossings users was undertaken on the East Suffolk Line between Ipswich and Saxmundham Junction. The key impacts are:

		• Sectional Running times - An unacceptable increase in section running times would make it difficult for the signaller to inform members of public when it is safe to traverse a level crossing, this is purely as a result of the slower trains. Up to 5 locations have been identified and the introduction of new Miniature Stop lights are to be installed at these locations. • Darsham Park & Ride - Option to include Station Car Park in new Park & Ride facility removing increased impact from station car park users who find it increasingly difficult to traverse the A12 to access the station. The only reasonable option is to traverse when the barriers are lowered, which means if they need to get an Ipswich bound train they have to cross the level crossing when the barriers are lowered and it is unsafe to do so. • Middleton ABCL - Red Light Safety enforcement cameras should be installed ahead of any increase in traffic to Sizewell C, consideration should be given to installing lay-by's such that there is somewhere safe to park for those users required telephone to gain permission to cross the level crossing or confirm to the signaller they are safely over the level crossing. Operational freight pathing constraints will also be considered to eliminate issues at both Jetty and Bloss level crossings, trains must not be stopped in Woodbridge station to allow the single line to from Saxmundham to Melton to clear, this would cause a freight train to block Jetty level crossing, which is unacceptable. Trains will only traverse Melton AOCL+B crossing in the down direction in between the hours of 07:00 and 21:00, it is unacceptable for trains to pass in the up direction as this would block Bloss level crossing which is an operational boat yard, this would be acceptable in-between the hours of 21:00 and 07:00 as the likelihood of anybody using the crossing in between these times would be slim. (ii) Including the protective provisions requested by Network Rail would ensure that before track access was granted to the Applicant appropriate agreements and mitigation would need to be in place with Network Rail. In addition it could be a requirement in the DCO for the Applicant to agree a programme of mitigation with Network Rail before running any additional trains to the proposed development
	SCC Comment	**The Applicant claims that Network Rail will take full responsibility for addressing the level crossings on the East Suffolk Line. However, this is not clear. Some level crossings will require public consultation (Brick Kiln and Westerfield), which could cause an issue to delivery timescales.** **In addition to this, resolution of the rail safety concerns at level crossings on the East Suffolk Line may require the closure or modification of the public highway or rights of way. No works or traffic regulation orders have been included within the DCO to do so. Information is required on how the Applicant plans to deliver the changes to the rights of way and the associated improvements to level crossings.**

		There is a risk that other changes to the East Suffolk Line and further across the network are required but have not been accounted for.
HW.1.27	ExQ to the Applicant, Network Rail	Change Request No. 2 The Change Request could see an increase in the number of freight trains running along the line. Please advise how this could be safely delivered to ensure there would not be unacceptable risks to users of level crossings both for the branch line and the Ipswich to Lowestoft main line
	Applicant's Response	Risk assessments have been completed on the level crossings on the Sizewell branch line which have identified that major interventions are not necessary from a risk perspective. Upgrades will however be made to level crossings to enhance the operational capability of the line, and avoiding the current requirement for trains to stop while the gates are manually operated. This will have the effect of also further reducing the already low risk at level crossings on the Saxmundham to Leiston branch line. SZC Co. and Network Rail are working together to identify level crossings on the East Suffolk line where there may be an increase in risk. If mitigations are required, these will be pursued by Network Rail as the asset owner and organisation with responsibility for the management of safety risk at the level crossings.
	Network Rail Response	Network Rail and the Applicant undertook a high level review of impacts to Level Crossings on the East Suffolk Branch Line between Ipswich and Saxmundham Junction. The review covered all public level crossings, Passive footpaths and User Worked crossings. A systematic review of train lengths, anticipated barrier down times, signaller constraints, sightlines as well as impacts from additional HGV traffic over Level Crossings was undertaken, resulting in a list of impacted crossings. These crossings have mitigating actions identified and we are continuing to work together with SZc and the local authorities to ensure all appropriate actions are taken. For most Level crossings the mitigation interventions involve the installation of Miniature Stop Light and overlay systems. These works are not complex in nature and require relevant agreements to be put in place to ensure timely delivery. Some additional Level Crossings were identified as requiring some mitigation work to manage the risk so far as reasonably practicable. Network Rail will ensure these works have been delivered before any freight trains start to operate. Level Crossing impacts on the branch line from Ipswich to Lowestoft have not yet been reviewed.

	SCC Comment	**See answer to HW.1.19 above**
8. Historic Environment		
HE.1.10	ExQ for the Applicant	Unrecorded Heritage Assets Paragraph 16.4.69 [APP-272] discusses the potential for heritage assets which have not previously been identified or recorded to be present in areas of the site that have not been subject to geophysical surveys and/or evaluation trenching. Please confirm if the SSSI crossing and borrow pit field 2 have been subject to survey? If not, please explain why.
	Applicant's Response	Neither the SSSI crossing nor Borrow Pit Field 2 have been subject to survey. As set out in Volume 2, Chapter 16, paragraph 16.4.69 (Terrestrial Historic Environment) of the ES [APP-272], environmental effects at the SSSI crossing were assessed to be minimal. This conclusion was based on the observed depth of modern made-ground within the former Sizewell B compound area, and areas of dense planting to the north. It is concluded that any near-surface archaeological remains would have been exposed to significant disturbance during the construction of Sizewell B. Given the significant biodiversity sensitivity of this site, it was not considered appropriate to carry out intrusive archaeological works as part of the wider evaluation programme. Access was not possible to Borrow Pit Field 2 without causing disturbance to livestock and crops that would have been unacceptable to the landowner. The results of evaluation from adjacent fields highlight the potential presence of archaeological remains in this area which are assessed at paragraph 16.6.42 [APP-272]. Appropriate provision will be made for archaeological investigation of this area prior to construction.
	SCC comment	**With regards to the SSSI crossing SCC is concerned that this area is not being scoped in for work. Surface disturbance is assumed but not yet proven, but there is also a potential for deep deposits- evaluation is required to determine this. We have previously advised the Applicant of the following, which we maintain is required:** **Potential for buried surface archaeological deposits, including wet-zone activity, as well as palaeo-environmental remains. Potential for waterlogged prehistoric settlement, potentially of major significance. For surface archaeology, trial trenched evaluation and palaeo-environmental assessment required, subject**

		to an agreed WSI, with mitigation as appropriate based upon the results. For deeper deposits, assessment required in line with the peat strategy. Further mitigation to be decided pending results of evaluation.
HE.1.21	ExQ for the Applicant	Additional Fen Meadow Habitat at Pakenham (Change 11) Please confirm what survey work has been undertaken at Pakenham to date.
	Applicant's Response	SZC Co. has not undertaken any archaeological fieldwork on the Pakenham site. It is considered that the effects of the proposed scheme would be limited and localised in any case, and that archaeological investigation targeted on discrete areas of disturbance secured by requirement would be the most appropriate response.
	SCC comment	**All areas at the Pakenham Fen site where ground disturbance is planned will need to be subject to archaeological trial trenched evaluation, followed by mitigation as appropriate. The nature of proposed works in this area is not yet clear, therefore at present, the entire site must be scoped in for post-consent archaeological assessment and mitigation.**
HE.1.22	ExQ for the Applicant	Site of Special Scientific Interest Crossing (Change 6) Both ESC and SCC state that the terrestrial historic environment should be considered because of the change in design [AS-307]. Please expand on why this change does not alter the assessment of effects on the terrestrial historic environment
	Applicant's Response	As noted in the response to Question HE 1.10 in this chapter environmental effects at the SSSI crossing were assessed to be minimal (Volume 2, Chapter 16, paragraph 16.4.69 (Terrestrial Historic Environment) of the ES) [APP-272], as near-surface archaeological remains would have been exposed to significant disturbance during the construction of Sizewell B. The changes proposed present an equivalent degree of intrusion such that it is anticipated that any effects would be of equivalent magnitude to the proposals assessed in the ES.
	SCC comment	**Please see SCC comment on HE.1.10**
HE.1.49	ExQ for the Applicant	Extension and Reductions of Order Limits (Change 12) Both ESC and SCC state that the terrestrial historic environment should be considered because of the change in design [AS-307]. Please provide a response

	Applicant's Response	The change in the order limits and configuration of the Two Villages Bypass in the Accepted Changes are very limited and, as such, it is not considered that effects would be materially different from those assessed in Volume 5, Chapter 9, section 9.6 (Terrestrial Historic Environment) of the ES [APP-432] with regards to the disturbance of archaeological remains and change to setting of heritage assets.
	SCC comment	**All areas within the revised Red Line Boundary for the Two Village Bypass which have yet to be fully evaluated will need to be scoped in for post-consent archaeological assessment and mitigation.**
9. Noise and vibration		
NV1.13	ExQ for the Applicant and Network Rail (part iii only)	Rail Noise (i) The placement of matting under the ballast would appear to be required for all locations where a sensitive receptor is within 20m of the centreline of the railway, and this matting should extend 10m beyond the end of the receptor building. How would this be delivered through the DCO? (ii) Does this require a specific standard of matting to be provided and method of laying of the matting and the ballast to meet the minimum noise absorption required and therefore is a specific minimum specification required? If so, how is this to be secured? (iii) Do Network Rail agree to this method of installation?
	Applicant's Response	(i) Works to the Saxmundham to Leiston branch line are secured in the dDCO as Works 4C and through Requirement 18. The particular characteristics referenced in the question, however, are specified in the draft Rail Noise Mitigation Strategy which forms Volume 3, Appendix 9.3E of the ES Addendum (Doc Ref 6.14) [APP-258]. Requirement 25 requires the detail of the Rail Noise Mitigation Strategy to be submitted to and approved by ESC before the operation of night-time trains. (ii) The under-ballast mat is required to achieve a specific standard, and an example of a product which has the required properties is included in Appendix A of the draft Rail Noise Mitigation Strategy, which is contained in Volume 3, Appendix 9.3.E of the ES Addendum (Doc Ref 6.14) [APP-258]. The principal requirement to be specified is the dynamic stiffness modulus. The proposed product must have achieved Network Rail "product acceptance" which will specify certain performance and installation requirements. The chosen product, with those performance and installation characteristics, will be part of the Track Approval In

		Principle documentation (the "Form A") accepted by Network Rail at the end of the next design phase which secures their place in the design. (James Cullane / Peter Fagg) (iii) SZC Co. are engaging with Network Rail through a Basic Asset Protection Agreement (BAPA) to achieve successful Approval in Principle which will demonstrate their acceptance of this solution. (James Cullane / Peter Fagg)
	Network Rail's Response	(iii) NR have an active BAPA in place which facilitates the design approval process. At present Network Rail does not have sufficient information to confirm this.
	SCC comment	**The Applicant and Network Rail need to clarify what noise mitigation infrastructure will be provided on the East Suffolk Line. It appears that it is assumed that continuously welded track on the East Suffolk Line is enough to reduce noise on the rail line, but this has not been assessed by Network Rail.** **Further information is also required on what mechanism will be used to deliver these improvements as they are not currently included within the DCO.**
NV1.26	ExQ for the Applicant, Network Rail, ESC, SCC	Rail Noise In order to minimise disturbance to receptors in close proximity to the rail line, particularly at night, would a period excluding train operations be reasonable and or enforceable?
	Applicant's Response	The timing of trains would be specified in the Freight access contracts, which are explained in response to Question NV.1.11 – and therefore enforceable. However, there is limited ability to 'choose' the timing of train operations. Night-time operations are necessary due to the absence of pathing capacity in the day. At night the scheduling of trains will be a function of the capacity available within the network timetable. The work undertaken on this has shown the ability to secure 7 train movements. Timing limitations would be very likely to reduce that number – especially as the slowed speed of the trains means that each one takes a considerable time to travel from the main line at Ipswich to site. Limiting train numbers would act against the policy imperative in the NPS to prefer train-borne freight where cost effective. The Applicant's view is that the balance lies in favour of securing the available capacity at night but ensuring that impacts are appropriately mitigated. Once established, the timetable would be fixed, creating certainty about the timing of the Sizewell C freight trains. An illustrative timetable is provided in Chapter 11 of the Consolidated Transport Assessment (Doc Ref 8.5(B)).

	Network Rail's Response	Network Rail could only restrict train movements based on safety or capacity issues. However, if the Examiner felt it was necessary, we understand a restriction could be included in the DCO as a requirement. However, to optimise freight train movements overnight paths are necessary. The Applicant will need to comment on their impacts as a result of excluding train operations.
	SCC comment	**As per our original response to this question, SCC's wish is to maximise rail movements and to have as many trains as are operationally possible; however, this must be balanced against causing a detrimental impact on residents. There is a balance to be struck between operational practicalities and the amenity of residents. If, as indicated by the Applicant in its response, timing limitations would reduce the number of train deliveries possible this would be of concern to SCC, as it would be likely to result in an increase of HGV deliveries. However, we have not seen the evidence that timing limitations necessarily lead to less trains being deliverable, so would seek further consideration of the possibility of a period during the night of no train operations, without impacting on the number of train deliveries.** **The Applicant should also set out how provision will be made (considering the night-time operation of freight trains, for maintenance of the railway, much of which is normally carried out at nights and weekends?**
NV1.49	ExQ for the Applicant	Two Village Bypass In light of the recognised significant adverse effects that would arise from the use of the two village bypass during operation, can this be regarded as sustainable development?
	Applicant's Response	The DCO application falls to be considered primarily against the policy requirements of the NPSs. Compliance with the terms of the NPSs would provide a strong indication that a proposal accords with government policy, including policies for sustainable development which involve the need to balance economic, social and environmental considerations. The NPSs are deliberately drawn to be wide ranging and to encompass all of those matters which Government considers are most directly relevant to the assessment of proposals for nationally significant infrastructure. There is no 'other' policy test which sits outside and above the NPSs. Even if the two village bypass were a stand-alone project assessed on its own merits, it would be appropriate to also recognise the significant benefits that it brings, along with the support for the principle of the bypass apparent through successive consultations, including the consistent support for a bypass from the affected parish councils, the District Council and the County Council. A bypass of at least the two villages is supported in the East Suffolk Local Plan (at paragraph 3.31) and in the Infrastructure Delivery Plan at Appendix B of the

		Plan, which describes the bypass as 'essential'. In this context, 'essential' is defined in the Plan as: "Essential infrastructure is the infrastructure that is necessary to support and mitigate development and ensures policy objectives of the Local Plan are met. Development could take place without this infrastructure but its sustainability would be undermined." The bypass, therefore, is recognised by the Local Plan to bring sustainability benefits. No party that supports the bypass can expect that it would not involve some adverse effects – for instance, in noise or landscape or ecology terms but the fact of some adverse effects is not such as to outweigh the benefits of the bypass or the need for it. Noise effects of the type referenced in the question also need to be considered in the context of other considerations. As the Noise Policy Statement for England explains (at paragraphs 2.17 and 2.18), noise effects need to be considered in the context of the Government's policy for sustainable development, which means that: "This should avoid noise being treated in isolation in any particular situation, i.e. not focussing solely on the noise impact without taking into account other related factors." Even if the noise effects were to be taken in isolation and even if the bypass was considered on its own merits without reference to its wider role and benefits, its noise effects are not such as to trigger the policy test at NPS EN-1 paragraph 5.11.9 because significant adverse effects on health and quality of life are avoided. Taken as a whole, however, and seen in its proper context, the two village bypass forms an important component of the mitigation measures necessary to ensure the delivery of nationally important infrastructure. In that context, it benefits from very strong policy support.
	SCC comment	**SCC considers it imperative that all efforts are taken to mitigate adverse effects above LOAEL and to avoid significant adverse effects above SOAEL, as set out in the NPS EN-1. This means mitigating noise at source through the implementation of quiet road surfacing, road noise barriers and landscaping as a first option before noise insulation is offered to residents. SCC requires that the Applicant makes a commitment to mitigate noise through engineering as a primary stage in its Draft Noise Mitigation Strategy, as well as clarify the process for monitoring and mitigating road noise.**
NV1.49	ExQ for ESC	Yoxford Roundabout Are the Council satisfied with the findings in respect of this part of the scheme and that the mitigation proposed to avoid the SOAEL being exceeded at Sunnypatch, The Old Barn, Rookery Cottages and Hopton Yard would achieve appropriate levels of mitigation to avoid harm to health and comply with the requirements of the NPS EN1 and NPSE.
	Applicant's Response	

	SCC comment	**SCC considers it imperative that that all efforts are taken to mitigate adverse effects above LOAEL and to avoid significant adverse effects above SOAEL, as set out in the NPS EN-1. This means mitigating noise at source through the implementation of quiet road surfacing, road noise barriers and landscaping as a first option before noise insulation is offered to residents. Discussions are ongoing on this between the Applicant and SCC and progress is expected, but this remains a key concern.**
NV1.55	ExQ for ESC	Yoxford Roundabout Delivery of screening and final working methodology is yet to be finalised. Are the Council satisfied that the method of mitigation is appropriately secured?
	Applicant's Response	
	SCC comment	**See SCC comment to NV.1.49**
NV1.91	ExQ for the Applicant, Network Rail	Level Crossing Sirens (i) Will all level crossings on the route require sirens to meet the appropriate safety standards? (ii) If this is not the case, please explain the differing standards and what would be expected to be provided at each level crossing.
	Applicant's Response	(i) At the public highway level crossings on the Saxmundham to Leiston branch line (Knodishall, West House, Saxmundham Road, Leiston) it will be necessary to add audible alarms/sirens to comply with Network Rail safety standards, as a result of the new addition of mechanical barriers with road traffic lights. The currently-installed manual gates increase the time it takes for trains to travel down the branch line, and will generate higher noise levels that could be reasonably avoided through design. (ii) Not applicable.
	Network Rail's Response	SZC have provided details in response to the examiners questions on locations required. In addition, Network Rail would add that there are some crossings on the East Suffolk Line (Ipswich to Saxmundham) that will need MSL's installing which will have Yodel's fitted as standard.

		Network Rail will set the volume to suit the local environment and work with local neighbours however it should be noted that these also need to be of an effective volume.
	SCC comment	**SCC remains concerned that this will cause an issue of disturbance at night to local residents, but understands there is a safety need. The Applicant should provide details on what other options are available if the noise volume levels are still causing a disturbance.** Would it be possible for a risk assessment to be undertaken to consider whether the risk that a visually-impaired user wishes to use the crossing over night is so small as to allow the volume to be significantly reduced or even cut in night-time hours?
NV1.94	ExQ for the Applicant, Network Rail	Night-time Rail Noise (i) Please explain the limiting factors for daytime deliveries. (ii) In understanding what these are, what alternatives have been considered that could overcome these limitations? (iii) How has the assessment of effects from night-time noise been assessed against these alternatives?
	Applicant's Response	There is insufficient rail capacity available on the East Suffolk line during the day to provide more than one rail path. This is due to the extended length of single track south of Saxmundham and the hourly passenger timetable, which leaves insufficient running time for additional services. The length of single track could be split with a passing loop which would increase the capacity on the line. Such a proposal was consulted through to the Stage 4 consultation. In addition to a passing loop, it would also be required to operate freight trains at 40mph along the line rather than the current maximum speed of 20mph. in order to avoid disrupting the passenger service. The combination of adding the additional freight services to the line, and required speed increases, would result in increasing the risk to level crossings on the East Suffolk line. In order to mitigate the increased risk, 45 level crossings on the East Suffolk line would require interventions. At the Stage 3 consultation it was proposed to close 12 footpath crossings and upgrade a further 33 level crossings to mitigate the increase in risk. As a result of further work undertaken by Network Rail it was decided that this option was not deliverable within the timescales required for the SZC project.

		Following this decision, the focus was to maximise the utilisation of the East Suffolk line overnight, outside of the passenger service where trains could operate within the current speed restrictions along the line. As there is no viable alternative to operating trains overnight, it has not been possible to assess night-time noise against an alternative rail scenario.
	Network Rail's Response	Network Rail have been engaged in previous reviews with SZC on freight operations on the East Suffolk Line. Day time operations will not be possible without significant impacts on daytime passenger operations. The proposed Freight trains will operate at significantly lower speeds than the passenger services and the Flask Path Train. Network Rail have undertaken quality assurance on the Capacity Analysis Technical Note (Feb 2021) and commenced reviews (i.e. Level crossing review) on the basis of the proposed 4 trains (7 night time and 1 day paths).
	SCC comment	As set out in SCC's Written Representation [REP2-189], SCC would prefer there to be no freight train movements at night because this is a new source and there is clearly much greater potential for disturbance at night. The responses above reflect our discussions with the Applicant and Network Rail, that they consider it impossible at this late point to deliver infrastructure investments to allow for day time freight trains in the required timescales. As set out in [REP2-189], we consider opportunities to do so were missed.
NV1.96	ExQ for the Applicant, Network Rail	Ipswich to Lowestoft Main Line (i) Please explain the current method of line construction for the main line between Ipswich and Saxmundham. (ii) Please confirm whether the joints between the sections of the track are located in a way as to minimise noise effects on receptors. (iii) It is understood from the assessment that the welds of joints for the Saxmundham to Leiston branch line are proposed to be undertaken in a certain way to minimise noise effects – please confirm whether this approach has been undertaken on the main line and if this is not the case please advise what the differences would be for receptors on the main line as opposed to those on the branch line.
	Applicant's Response	The East Suffolk line has, for the most part, continuous welded rail (CWR), with some lengths of jointed track as well as switches and crossings (S&C). Details such as the exact location of the kinds of welds and joints in CWR and S&C that give rise to additional noise and vibration are not routinely held by Network Rail, and work

		is currently in progress to establish their exact locations and where necessary to plan appropriate mitigatory action.
	Network Rail's Response	The East Suffolk Line has, for the most part, continuous welded rail (CWR), with some lengths of jointed track as well as switches and crossings (S&C). Network Rail are currently working with SZC on proposals for Track enhancements to SZC between Westerfield and Saxmundham Junction. In addition discussions includes status and potential alterations to sleepers, fasteners and welds to assist with noise mitigations. This work is ongoing and as such no further comments can be provided at this stage.
	SCC comment	**See answer to NV1.13**
10. Landscape and Visual Impact		
LI.1.45	The Applicant	Outage Car Park SCC consider that the staff car parking and outage car parking at Goose Hill represents additional development within the AONB for which there is no overriding need in the proposed location ([RR-1174] and [AS-307]). What consideration has been given to less sensitive locations, including the shared use of the Sizewell B outage car park?
	Applicant's Response	The outage car park is part of the critical infrastructure required to operate and maintain the power station. By extension, the adjacency of the outage facility to the Power Station is fundamental to delivering planned and unplanned maintenance without compromise to safety and efficiency of operation. If the facility were to be substantially detached from the main site (and by necessity associated with a park and ride facility) the operator would be severely restricted in terms of maintaining responsiveness and flexibility for the workforce, particularly in the event of unplanned or emergency situations where time and cost are critical. Equally, there are significant logistical problems in ensuring a large workforce, often on different shift patterns, can be properly served by a P&R facility, which by necessity would be required to frequently run on a 24hour cycle. On grounds of practicality, flexibility and efficiency the Goose Hill site is considered to provide the optimal location and therefore no other sites outside of the AONB have been considered. This judgement is not blind

		to the impact on the AONB of the car park and the land take required to provide operational and outage parking in an area already generally impacted by the power station and access to it. However, as demonstrated within the submission, impacts can be appropriately mitigated by the approach to design and siting through the extension of existing woodland planting extending from existing perimeter planting and by breaking up the extent of hard standing with planting, different surface materials and walking routes. With regard to the potential to share an outage facility with Sizewell B the operational arguments against this approach are set out below: • A singe station outage car park would require planned and coordinated outages avoiding overlap which is not possible to guarantee and could very quickly, be disrupted due to unforeseen circumstances: o An outage could overrun o Forced/un-planned outage – these are unpredictable by their very nature and therefore you cannot anticipate when they will arise, resulting in potentially concurrent outages o Delaying an outage in order to avoid a clash would be a huge commercial risk, with a significant cost to the operator if a restart was delayed o Following a forced outage, this then results in the planned outages having to be changed to allow for the 18 month period between each outage (per unit), which will then lead to the gaps previously planned between outages to be altered and come closer together or overlapping. o SZC Co. cannot be sure when Unit 1 Sizewell C will be operational and the refuelling cycle times in the early phases of the operation are variable in order to obtain the correct fuel mix in the core. It is therefore not economic
	SCC Comment	**SCC wishes to refer the ExA to its Written Representation [REP2-189] setting out its position in respect of whether there is an overriding need to locate the proposed outage car park within the AONB. That Written Representation was based on having seen the Pre-Submission arguments raised here and challenges a number of the points made in the Applicant's answer.**
LI.1.46	ExQ to the Applicant	SSSI Crossing – Design (Change 6) The MDS Flood Risk Assessment Addendum [AS-157] states that by 2090 the maximum crest height of the SSSI crossing is likely to need to be increased to 10.5m AOD. Noting the comments made by SCC in [AS-307], please explain why no further change is proposed in respect of the height of the crossing to mitigate against future

		flood overtopping? What consideration has been given to any future disturbance in respect of established landscaping on the embankments if an increase in height is required in the future?
	Applicant Response	As stated in our answer to question G.1.33, in response to feedback from stakeholders following our January 2021 change application, SZC Co. commissioned a design review to determine if the structure could be optimised to further reduce impacts on Sizewell Marshes SSSI. This has included consideration of the adaptive design. Whilst this work is still being finalised, SZC Co. is satisfied that we can reduce the width of the structure from 40m to approximately 15m at the end of the construction phase by removal of the eastern side of the bridge deck. Should the crossing need to be adapted in the future to reduce the risk of overtopping, we are satisfied that this could be carried out within the retained 15m operational deck of the bridge. The optimised adaptive approach is not expected to significantly affect established landscaping. SZC Co. intend to submit details of the optimised SSSI crossing at Deadline 4.
	SCC Comment	**While we await the revised proposals anticipated for D4, SCC will wish to see the degree to which it can be shown that this reduces the "barrier effect" for ecology. These changes do not though address the concerns about the loss of a greater amount of SSSI with the causeway proposal than the bridge.**
LI.1.49	ExQ to the Applicant	Independent Environmental Trust In respect of the proposed independent Environmental Trust, please provide further detail on the following areas: i) Governance and Implementation ii) Financing iii) Membership Would the Trust form part of any mitigation for the proposed development?
	Applicant Response	As stated in response to question BIO.1.43, SZC Co. is seeking to explore additional legacy and enhancement measures beyond those to be secured in the draft DCO (Doc Ref. 3.1(C)) (through the measures embedded into the scheme and secured through the Deed of Obligation (Doc Ref. 8.17(C))) through an environment trust. SZC Co. has now established a working group of external stakeholders who met for the first time on 25 May 2021, with a focus on shaping the objectives of the trust. Meetings scheduled for later in 2021 will consider matters relating to financing, membership and other matters needing to be considered to enable a formal launch of the ambition in late 2021. The next meeting is scheduled for July, and SZC Co. will provide an update on the environment trust at Deadline 4. As confirmed in response to question BIO.1.43, the trust is not

		necessary to make the proposed development acceptable in planning terms, those measures are already secured through the measures described above. Therefore, it is not the intention for the Trust to form part of the mitigation.
	SCC Comment	**Given that there the Applicant will provide an update on this at D4, SCC will comment in response to that.**
LI.1.51	ExQ to the Applicant	Pylons – Alternatives and Impact The change to both the location of pylon parameter zone P3 and reduction in height of the southernmost pylon from 79m AOD to 59m AOD is noted. Nonetheless, concern has been raised by several IPs, including [RR-0877, RR-0878, RR-1170, RR-1174], regarding the impact within a sensitive landscape and whether all alternatives to pylons have been adequately discounted. Noting the comment made at paragraph 3.2.82 of Appendix 8.4A [APP-591] please confirm the outcome of any further assessment regarding undergrounding options. Please also confirm what consideration has been given to the use of Gas Insulated Lines.
	Applicant Response	In order to present a robust planning case for the project, the scope of undergrounding the power export connections has been reviewed in detail. In carrying out this review, SZC Co. has drawn on the collective experience of the EDF Group's global power transmission engineering centre in Paris, the fleet of operational nuclear power stations in the UK, and the organisations currently engaged in the construction of Hinkley Point C. The Power Export Connection Technical Recommendation Report (Appendix 5E of the written responses) comprehensively considers the potential options for the power export connection including: • Underground cables • Gas insulated lines • Overhead lines The evaluation has been guided by safety as the overriding priority for the project. Issues of constructability and schedule impact were brought out by detailed analysis of potential underground and overhead routes through the main development site. The impact of selecting a particular option on nuclear safety was assessed, recognising the significant role that the power export connection plays in ensuring power is always available to the plant from National Grid. Please refer to this report (at Appendix 5E of the written responses) for a detailed assessment of the options considered.
	SCC Comment	**SCC wishes to refer the ExA to its Written Representation [REP2-189] setting out its views, and the evidence from its technical consultants, on the potential of the use of Gas Insulated Lines as an alternative to pylons and overhead lines. SCC had the opportunity to see a pre-submission version of the report included by the Applicant at Appendix 5E and the Council's WRs address the matters referred to here.**

11. Socio-Economic		
SE1.43	ExQ to the Applicant and Network Rail	Rail Passenger Services (i) A number of RRs [Greater Anglia, Kelsale cum Carlton Parish Council, Framlingham Town Council, Sudbourne Parish Council in response to proposed changes AS-307] express concern about the potential loss of passenger rail services in the event the freight paths are created as suggested, please explain what effect the proposed freight strategy would have on passenger rail services. (ii) Has the alternative of dualling the Lowestoft to Ipswich line which could give significant legacy benefits including providing the opportunity to significantly increase passenger train services been considered as an option? (iii) Was any other form of expanding the network considered?
	Applicant Response	Response to (i) SZC Co.'s rail freight proposals for four freight trains per day would not have a detrimental impact on passenger train services on the East Suffolk line as seven of the train movements would operate overnight, after the last passenger train of the evening and before the first passenger train the following morning. The eighth train movement would take place in the existing daytime nuclear flask path, without disruption to the existing passenger train service. Response to (ii) Feasibility work undertaken by Network Rail established that in order to run freight trains during the day additional rail capacity was required due to the extended length of single track rail. The length of single track could be split with a passing loop which would increase the capacity on the line. Such a proposal was consulted through to the Stage 4 consultation for the rail-led freight strategy. In addition to a passing loop, it would also be required to operate freight trains at 40mph along the line rather than the current maximum speed of 20mph. in order to avoid disrupting the passenger service. The combination of adding the additional

		freight services to the line, and required speed increases, would result in increasing the risk to level crossings on the East Suffolk line. In order to mitigate the increased risk, 45 level crossings on the East Suffolk line between Ipswich and Saxmundham would require interventions. At the Stage 3 consultation it was proposed to close 12 footpath crossings and upgrade a further 33 level crossings to mitigate the increase in risk. As a result of further work undertaken by Network Rail it was decided that this option was not deliverable within the timescales required for the SZC project. Following this decision, the focus was to maximise the utilisation of the East Suffolk line overnight, outside of the passenger service where trains could operate within the current speed restrictions along the line. Sizewell C freight trains would only operate on the southern portion of the East Suffolk line between Ipswich and Saxmundham. For a freight train to operate from the Lowestoft each service would require a two locomotives, at the front and rear of the train, and two train drivers to access the Branch line from that direction. Response to (iii) Only those interventions which would be required to deliver Sizewell Co.'s freight strategy have been developed.
	Network Rail	i. As SZC have commented seven of the eight services would operate overnight. The day time 'flask path' requires close monitoring as the scheme matures as the new freight movement would be slower resulting in a risk to operations. The night time paths support the approach to not impact on passenger services, however, the interaction of these trains with all the other traffic in the Ipswich area needs to be further managed as the concept matures as any late running could have a knock on affect to the morning passenger train services. It has been suggested that EDF looks at introducing an intermediate block signal on the single line between

		Saxmundham and Woodbridge. This would mitigate any late running. The proposed day time 'flask path' requires close monitoring as the scheme matures as the new freight movement would be slower resulting in a risk to operations. Network Rail will be continuing to work with SZC on how best to mitigate impacts. Network Rail have previously advised that there is additional benefits (more robust overnight operation) if additional block signals on the Single line were added. ii. Network Rail agrees with the Applicant's response shown opposite. Dualling the Lowestoft to Ipswich line was not considered a feasible option iii. No
	SCC comment	**SCC remains concerned about the impacts of late running/delayed trains on passenger train services. Further work on capacity of the East Suffolk Line / rest of the rail network needs to be presented . The Applicant needs to work closely with Greater Anglia Trains to understand impacts.** **The improvement works on the rail line as part of the Sizewell C mitigation may also have adverse effect on passenger services if not well planned. Operation of Sizewell C freight services on rail lines past the East Suffolk Line may be problematic as those lines will be occupied throughout the 24-hour period on most days.**
12. Traffic and Transport		
TT.1.1	ExQ to the Applicant	Freight Movement Modal Split by Rail Table 2.2 [AS-280]. Explain why the lower limit in the Rail column of this table is lower than the original application amount of 38% by rail?
	Applicant Response	It has been assessed that 40% of imported material requires road transport due to its original point or material type, including the relatively small volumes of some materials (paragraph 2.1.8 – 2.1.12 of the Freight Management Strategy [AS-280]). The remaining 60% generally represents bulk materials which are suited to

		either rail or marine transport. The rail import will be the primary means of import for concrete aggregate due to the need for a robust material supply all year round which cannot be offered by the marine imports. Depending on the capacity for both the rail and marine infrastructure, bulk imported backfill material can be allocated at differing proportions between the two transport modes. The current forecast assumes all concrete aggregate and 50% of the fill aggregate are imported by rail with the remaining 50% of fill aggregate imported by marine. This results in rail representing circa 46% of imports, marine accounting for circa 14% and road imports remaining at circa 40%. The reason for the range of rail imported proportion noted in Table 2.2 [AS-280] is if 100% of the backfill materials was imported by marine the corresponding proportions would be closer to rail 31%, marine 29% and road 40%. The modal split of materials and their proportions via rail and marine continue to evolve as the supply chain engagement continues to ensure the most efficient import method is used. The different potential sources have a range of existing infrastructure and supply routes to suit rail or marine. Depending on the source the proportions between rail and marine many change.
	SCC Comment	**There still seems to be ambiguity around volumes and sources of materials.** **The Applicant should demonstrate whether this is an issue when the BLF is not operational – will rail be required to take a higher load? Could this see increase in train operation beyond the proposed 5/6 day operation? Or could it result in increased numbers of HGV movements?**
TT.1.3	ExQ to the Applicant and Network Rail	Provision of Additional Rail Capacity Explain whether the current additional rail proposals are based on ongoing development of the Network Rail Governance for Railway Investment Projects (GRIP) 2 report prepared when a Rail Led strategy was being considered at Stage 3 Consultation and if so: (i) Explain what GRIP stage proposals are currently at; and (ii) Set out the delivery timescale for the necessary improvement works.

	Applicant Response	The current additional rail proposals are based on ongoing development of the Network Rail (NWR) GRIP 2 report. The GRIP 2 report considered two scenarios: • Operating 2 trains per day (tpd) overnight, outside of the passenger service, within the existing track capability and regulations; • Operating 5 tpd during the day, taking into account the passenger service timetable and considering what additional infrastructure or operating requirements would be necessary. These led to two freight management strategy options being consulted on at the Stage 3 pre-application consultation: • Road-led strategy – based on 2 tpd operating overnight on the East Suffolk line. This included proposals on the Saxmundham to Leiston branch line but not on the East Suffolk line; • Rail-led strategy – based on 5 tpd operating during the day. This included proposals for a passing loop on the East Suffolk line and the required interventions at level crossings to reduce safety risks as well as proposals on the Saxmundham to Leiston branch line. The rail-led option was not taken forward once it became clear that the scale and complexity of the upgrades required on the East Suffolk line would have posed a significant risk to the required timescale for completing the development works. Further assessment of existing rail capacity identified the potential to achieve a third train per day without the need for upgrade works on the East Suffolk line; so this additional path was incorporated into an integrated freight strategy proposed at Stage 4 preapplication consultation. Further consultation and development of the Sizewell C Project logistics strategy identified that the infrastructure included within the DCO could enable the operation of up to four freight trains per day in each direction. The current rail proposals are as described in Part 1 of the Proposed Changes to the Application, dated January 2021, section 2.2, “Change 1: Potential to increase the frequency of freight train movements to facilitate bulk

		material imports by rail" [AS-281]. This document describes the potential to increase the number of rail deliveries to the main development site during the peak construction phase, thus reducing the number of Heavy Goods Vehicles (HGV) movements on local roads. It is proposed to initially operate up to 2 trains in each direction to and from the Land east of Eastlands Industrial Estate (LEEIE) per 24-hour period (i.e. 4 train movements). Once the Green Rail Route is operational, the number of train movements are proposed to increase to up to 7 overnight movements and 1 daytime movement to and from the temporary construction area, with the potential to also run trains on a sixth night, assumed to be Sunday nights into Monday mornings. The proposals are currently being developed to GRIP 3 stage, in line with SZC Co.'s response to question G.1.51 in Chapter 2, Part 1. SZC Co.'s response to question G.1.51 also provides a timeline for the delivery of the necessary rail infrastructure.
	Network Rail	i) SZC have entered into a BAPA agreement for the Sizewell Branch Line and Saxmundham Junction workstreams which was agreed in March 2021. NR anticipate an Options Selection Report within the next 4 weeks to commence design review and engineering engagement, based on options SZC'z designers has produced. Current status remains at GRIP 2. ii SZC have provided an indicative timetable in response to question G.1.51
	SCC Comment	**SCC seeks clarification whether the changes to the East Suffolk Line require a GRIP process. Within the current GRIP documents there is little consideration given to the improvement needs of the East Suffolk Line, yet level crossing work is required. GRIP 5 is anticipated to end in February 2023** **No further mention of rail capacity beyond the East Suffolk Line has been made by the Applicant, which could present operational issues.**

TT.1.4	ExQ to the Applicant	Provision of Additional Rail Capacity Surrey County Council [RR-1174] Paragraph 24 provided a link to a consultant's report concerning the deliverability of rail improvements. Provide a response to the issues set out in that report
	Applicant Response	The Suffolk County Council's report (entitled Sizewell C DCO application, Rail Proposals, 17 September 2020 by SCC, Aecom and Cadenza Transport Consulting)18 does not include a defined list of issues to respond to. However, a summary of the key issues and responses is provided in the table below. ***[Table omitted]*** The Aecom report also identified some potential options to increase the volume of material moved by rail freight, as follows: "Work with Network Rail as early as possible to consider each level crossing against different permutations of timing, frequency and speed of freight trains to determine what might be possible without major changes to level crossings infrastructure. This would be 'reverse engineering' to determine what the level crossings are able to accommodate, and design the timetable around this in order to minimise impacts on the programme." In parallel SZC Co. were independently doing this and where possible these opportunities to operate more trains without the need for significant works to level crossings on the East Suffolk line were incorporated in the Transport Assessment Addendum [AS-266]. Further detail is set out below. ***[Table omitted]*** The Aecom / Cadenza report referred to in RR-1174 details a number of opportunities for SZC Co. to engage with Network Rail to improve the deliverability of rail. SZC Co. has been and continues to engage with Network Rail on all these opportunities to deliver additional materials by rail as detailed in the January 2021 submission. There is nothing within this report that suggests that the revised Freight Management Strategy with respect to rail cannot be delivered.
	SCC Comment	**SCC wishes to refer the ExA to its Written Representation [REP2-189] setting out (from paragraph 2.10 onwards) an overview of its perspective on the evolution of the rail proposals, and SCC's stance on them. Paragraph 2.16 sets out a suitable response to the Applicant's answer to this question: "While SCC**

		understands from discussions with the Applicant and Network Rail that they consider it impossible at this late point to deliver infrastructure investments to allow for day time freight trains in the required timescales, we consider opportunities to do so were missed. As a result, SCC, other stakeholders and the local communities are forced into a position where they are responding to two unpalatable options forced upon them: Night time trains versus an increase in HGVs on the roads. " **There is an omission in the Applicant's referencing of the Aecom/Cadenza report, in that, whilst train operation during the day would not be possible because of the timetable of trains operating on the line does currently not provide track capacity needed to run the freight trains, this would be possible if a loop is provided.** **Ownership of level crossing improvements needs to be defined, which will also be needed for night-time operation.**
TT.1.5	ExQ to the Applicant and Network Rail	Deliverability of Rail Capacity (Reference Table 4.1 [AS-280]) Provide comment on the deliverability and anticipated availability date of the following: (i) The early years rail provision – 2 trains /day to the Land East of Eastlands Industrial Estate (LEEIE): (ii) The DCO baseline rail provision – 3 trains / day; (iii) Enhanced rail provision – 4 trains / day; (iv) The potential to run trains 6 days a week rather than the 5 proposed; and (v) The potential to run 5 trains a day.
	Applicant's response	SZC Co.'s response to question G.1.51 provides a timeline for the delivery of the necessary rail infrastructure. The anticipated availability dates are as follows: (i) The early years rail provision – 2 trains /day to the Land East of Eastlands Industrial Estate (LEEIE): January 2024. (ii) The DCO baseline rail provision – 3 trains / day:

		Not being progressed. (iii) Enhanced rail provision – 4 trains / day: August 2024. ExQ1: 21 April 2021 Responses due by Deadline 2: 2 June 2021 Page 76 of 183 ExQ1 Question to: Question: (iv) The potential to run trains 6 days a week rather than the 5 proposed: August 2024. The potential to run 5 trains a day: not currently being progressed.
	Network Rail's response	Network Rail have been working on the following as the basis of proposed operations: - 2 Trains (4 paths) From January 2024. All paths at night - 4 Trains (8 paths) From August 2024. 7 paths at night and 1 path during the day (Flask Path) SZC have advised the following are not being progressed: (ii) The DCO baseline rail provision – 3 trains / day: Not being progressed (v) The potential to run 5 trains a day: Not currently being progressed
	SCC comments	**The Applicant claims that Network Rail will take full responsibility for addressing the level crossings on the East Suffolk Line. However, this is not clear and requires confirmation.** **Some level crossings will require public consultation (Brick Kiln and Westerfield), which could cause an issue to delivery timescales.** **The GRIP process for improving the East Suffolk Line is also not defined by the Applicant – the assumption is that Network Rail will plan and deliver the improvements– but this has, to our knowledge, not been agreed by Network Rail.**
TT.1.7	ExQ to the Applicant	Capacity of Rail Wagons Appendix 9.3A Appendix B Appendix III [AS-257] identifies the rail wagon parameters used in the ground borne noise and vibration report. It states that the payload of a rail wagon is approximately 77.9 tonnes. This

		would make the theoretical capacity of the rail provision greater at 1558 tonnes per train. This is further supported by the experience set out in Associated British Ports (ABP) submission [AS-307] section 3.2.14 where they also suggest that train capacity can be 1560 tonnes per train. Explain this discrepancy and also if necessary, provide alternative calculations, using train numbers in Table 3.1 [AS-280], as required in previous question of revised rail capacity.
	Applicant's response	For the purposes of the rail bulk import capacity an import payload of 1,250t per train has been assumed, this has been derived based on the published operational parameters of the rail infrastructure. The Network Rail Sectional Appendix states a Route Availability (RA) of the East Suffolk line and Saxmundham to Leiston branch line as RA7 and a trailing weight of 1,730t (rounded to 1,800t as route planning assessed in 200t increments) per train. The RA7 category limits the axle load of each wagon to 21.5t, resulting in a gross wagon load of 86t. There are several different types of rail wagons that could be used to haul bulk materials via rail, each of these has slightly differing capacities and tare weights which impact of payload available. A typical JNA open wagon has a tare weight of 23.7t, therefore a maximum payload of 62.3t can be carried before the axle load limit is exceeded. This results in the wagon being only partially filled as the design capacity of a JNA wagon is 77.9t payload (101.6t gross) i.e. the total capacity would exceed the permitted axle load of the branch line. An alternative HOA hopper wagon (bottom discharge) may also be used. This has a tare weight of 24.2t allowing a max payload of 61.8t. As with the JNA wagon, this wagon is only partially full as a HOA wagon has a design capacity of 77.8t payload (102t gross). The trailing weight restriction places a maximum gross weight of the wagons hauled by the locomotive to ensure sufficient traction and breaking on the gradient of the line. The 1,800t limit on the Saxmundham to Leiston branch line results in a maximum of 20 wagons per train (20 x 86 = 1,720t). Therefore assuming 20 wagons this results in a rail import of between 1,236 and 1,246t, assumed as 1,250t per train. Considerable further rail enhancement beyond that being considered by the project, such as rail underbridge replacement and track bed renewals, would be required to permit the full capacity of the wagons to be utilised, therefore the maximum wagon payload capacity of 77.9t will not be achieved. For the purposes of noise and vibration assessment the theoretical maximum capacity of the rail wagons has been

		used, i.e. 77.9t payload. While this cannot be achieved due to the condition of the rail infrastructure it represents a conservative worst case for the assessment. The 1,560t laden cargo weight referred in Associated British Ports (ABP) submission [AS307] section 3.2.14 related to rail freight into the Port of Ipswich. This section of track in not under the same constraints as those detailed above and allows greater wagon payloads to be imported by rail.
	SCC comments	**SCC seeks confirmation whether weight restrictions on rail bridges have been considered.**
TT.1.8	ExQ to the Applicant	Additional Marine Capacity - Permanent BLF Does the revised design reduce the number of AIL that will need to travel by road? If so set out the original and revised numbers of AIL by: (i) By road each year and in total; and (ii) By sea each year and in total.
	Applicant Response	Information with regards to AILs by marine and road is set out in the updated Construction Traffic Management Plan (CTMP) (Doc. Ref. 8.7(A)). There are two types of AILs: permanent equipment needed for the power station (referred to as permanent equipment AILs), and temporary equipment needed for the construction of the main development site such as excavators, cranes etc (referred to as temporary construction AILs). The permanent BLF has been designed to accommodate the permanent equipment AILs. As set out in paragraph 3.3.25 of Volume 2, Chapter 3 of the ES [APP-184], it was estimated that annual campaign periods (approximately April to October) for a total of approximately 4 years would result in approximately 120 beach landings at the permanent BLF, with each barge accommodating an average of 1.5 permanent equipment

		AILs. The DCO design of the permanent BLF could therefore accommodate up to 180 permanent equipment AILs during the construction phase. At the time of the DCO submission, the engineering team were basing the permanent BLF design on a high-level estimate of the required permanent equipment AILs of 178. Since the DCO submission, further work has been undertaken to derive an accurate forecast of the permanent equipment AILs, which are now forecast to be 389. Therefore, the design of the permanent BLF was enhanced to accommodate the increased number of permanent equipment AILs. As set out in paragraph 2.2.64 of Volume 1, Chapter 2 of the ES Addendum [AS-181], it is estimated that annual campaign periods (approximately April to October) for a total of approximately 4 years would result in approximately 400 beach landings at the permanent BLF, with each barge accommodating an average of 1.5 permanent equipment AILs. The refined design of the permanent BLF has therefore been assessed to accommodate up to 600 AILs during the construction phase. With regards to the temporary construction AILs, as a worst case, these have all been assumed to be transported by road but SZC Co. will seek to utilise spare capacity within the enhanced permanent BLF to deliver some of the heavier / larger temporary construction AILs by sea aspects such as programme and weather allow. The total number of temporary construction AILs for the whole construction phase is unknown at this stage but the most accurate data available is from Hinkley Point C for the construction to date. A breakdown of estimated temporary construction AIL two-way movements to/from the main development site is provided in the updated CTMP (Doc. Ref. 8.7(A)) and shows that there is expected to be an average of circa 1,400 AIL twoway movements per annum to/from the main development site. The majority (77% on average) of the temporary construction AIL movements are 3.5m wide or less. Based on a construction period of 12 years and the Hinkley Point C data, there is estimated to be circa 16,800 temporary construction AIL movements (i.e. in or out of the main development site) over the construction phase.

		In summary, the enhanced design of the permanent BLF could potentially reduce the number of AILs that will need to travel by road, if any spare capacity can be utilised for some of the largest/heaviest temporary construction AILs. However, for the purposes of providing a worst-case assessment of AIL movement by road within the CTMP (Doc Ref 8.7(A)), it has been assumed that only the permanent equipment AILs would be delivered via the permanent BLF and that all of the temporary construction AILs would be delivered by road.
	SCC Comment	**Additional information is provided on the potential number of AILs based on their widths; 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; this would help highlight relative impacts on the highway network.** **Table 3.2 within the [REP2-054] Construction Traffic Management Plan (CTMP) table 3.2 states that the first year of Hinkley Point construction had the peak number of AILs to date (2,055) compared to the average of 1,400 quoted in the response. While it is acknowledged the BLF is vital to remove AILs from roads it is also important to recognise the number of movements before the BLF open and the limited potential effect of the BLF.**
TT.1.9	ExQ to Applicant	Permanent BLF – Usage Confirm whether, other than AIL, the permanent BLF will be used for other freight deliveries and if so, set out what quantity of freight is expected to be delivered via this facility each year and in total.
	Applicant Response	As set out in response to question TT.1.8 in this chapter there is potentially some spare capacity within the enhanced permanent BLF, which could be utilised to deliver some of the largest/heaviest temporary construction AILs by sea. However, for the purposes of providing a worst-case summary of AIL movements by road within the CTMP (Doc Ref 8.7(A)), it has been assumed that only the permanent equipment AILs would

		be delivered via the permanent BLF and that all of the temporary construction AILs would be delivered by road. Any spare capacity within the permanent BLF lends itself best to being utilised by temporary construction AILs as they would be able to be rolled on and off the BLF in a similar way to the permanent equipment AILs and therefore no additional infrastructure would be required. The permanent BLF is not proposed to be utilised for bulk material deliveries as it would require additional off-loading infrastructure to off-load material from the barges. This offloading infrastructure would require additional space, which is not available, and in addition the infrastructure required would impinge on the ability to receive the AILs for which the permanent BLF is designed. The permanent BLF also has to be demobilised during the winter period making it unavailable to receive other materials in this period. Therefore, the temporary and permanent BLFs have been designed to separately accommodate bulk materials and AILs respectively.
	SCC Response	**The Applicant indicates that spare capacity for the permanent BLF could be used for Temporary AILs; further understanding is requested on the process that would take place here to ensure that all available capacity is used where reasonable to do so and how this is embedded into the project.**
TT.1.10	ExQ to the Applicant	Temporary BLF – Total Capacity Paragraph 3.3.34 of Appendix 2.2B [AS-202] states that the temporary BLF will operate for approximately 8 years. In paragraph 3.3.35 it goes on to say that 1,275,000 tonnes per year could be achieved. On that basis set out the calculation to show the theoretical maximum marine freight capacity of the temporary BLF each year of operation and in total.
	Applicant Response	The DCO allows for the flexibility of the temporary BLF to meet the project requirements, with 8 years being the upper limit of the operational life of the temporary BLF. The operational period is limited by the

		construction and commissioning of the temporary BLF, currently resulting in the temporary BLF becoming available from 2025; then the need for the temporary BLF to be removed to allow the completion of the Permanent Sea Defence. The principal intent of the temporary BLF is to support the import of bulk fill materials during the earthworks period of the project which will predominantly occur during 2025 to 2027. The temporary BLF use is stated as up to 400 vessel deliveries during the April-October season and potentially up to 200 visits during the November - March season, as set out in Volume 1, Chapter 2 of the ES Addendum [AS-181], paragraph 2.2.75. Assuming 4,500t per vessel, limited due to draft and swell heights, there is a maximum theoretical annual capacity of 1.8Mt if every tide had suitable weather conditions (based on 400 vessel deliveries between April – October). However due to the variable nature of the weather, including the wind and visibility as well as the sea conditions for wave / swell heights, an allowance for down time due to unsuitable weather has been made resulting in the stated 1,275,000t annual import capacity. Further opportunity for marine imports outside of the nominal campaign window (November to March) would be likely to experience a much higher proportion of down time due to unsuitable weather and therefore has not been included in the assessment. Maximum Marine capacity: Year 1: 0M t (temporary BLF not available) Year 2: 0M t (temporary BLF not available) Year 3: 0.90M t (temporary BLF available for majority of campaign season) Year 4: 1.275M t Year 5: 1.275M t Year 6: 1.275M t Year 7: 1.275M t Year 8 1.275M t

		Year 9: 1.275M t Year 10: 1.275M t Year 11 onwards – temporary BLF removal to allow for Sea Defence TOTAL: 9.825M t It should also be noted that the demand profile for the import of bulk materials is heavily weighted towards the first 5 years of the project, therefore the above maximum imports in the later years of the project would not be achieved due to the material demands of the project being below the above capacity. For instance on completion of the earthworks phase of the project the requirement for bulk import reduces. Concrete aggregates would constitute the next largest volume of bulk material import demand, however as this material is required continuously alternative import means outside of the nominal marine campaign periods are required.
	SCC Comment	**Further information is sought from the Applicant on the assumptions around the variable nature of the tide and what reasonable potential there is for this to affect the amount of material that could be imported by marine, and impacts on the highway network as a result.**
TT.1.11	ExQ to Applicant	Provision of Road Capacity – Heavy Goods Vehicle (HGV) Total Capacity Paragraph 3.2.8 [AS-280]. Using the assumption (HGV capacity = 1250/67.5 = 18.5 tonnes) and understanding that no controls are proposed that limit the size of HGV's to those set out in paragraph 2.1.23 concerning potential HGV sizes, provide the following: (i) The theoretical HGV capacity by year and in total using the original submitted limits set out in paragraph 1.2.4 and the Construction Traffic Management Plan (CTMP) [APP-608]; and (ii) The theoretical HGV capacity by year and in total using the suggested limits in paragraph 4.1.12.

	Applicant Response	Using the assumption of 18.5t payload per HGV: i) The theoretical HGV capacity per year, based on paragraph 1.2.4 of the Freight Management Strategy [AS-280] (i.e. Early years at 300 HGV deliveries per day and peak construction phase at 325 HGV deliveries per day (with busiest day at 500 HGV deliveries per day)) is as follows: Year 1: 1.39M t (300 daily HGV deliveries) Year 2: 1.41M t Year 3: 1.52M t (325 daily HGV deliveries) Year 4: 1.52M t Year 5: 1.52M t Year 6: 1.51M t Year 7: 1.52M t Year 8: 1.52M t Year 9: 1.52M t Year 10: 1.52M t Year 11: 1.51M t Year 12: 1.51M t TOTAL: 17.95M t

		ii) The theoretical HGV capacity per year, based on paragraph 4.1.12 of the Freight Management Strategy [AS-280] (i.e. Early years at 300 HGV deliveries per day and peak construction phase at 250 HGV deliveries per day (with busiest day at 350 HGV deliveries per day)) is as follows: Year 1: 1.39M t (300 HGV daily deliveries) Year 2: 1.41M t Year 3: 1.17M t (250 HGV daily deliveries) Year 4: 1.17M t Year 5: 1.17M t Year 6: 1.16M t Year 7: 1.17M t Year 8: 1.17M t Year 9: 1.17M t Year 10: 1.17M t Year 11: 1.16M t Year 12: 1.16M t TOTAL: 14.46M t However, the above does not represent the true annual import capacity or profile. The HGV payload derived in Paragraph 3.2.8 of the Freight Management Strategy [AS-280] compares the import by train to an equivalent number of HGVs with an assumed payload capacity of 18.5t. As rail is solely used to import bulk aggregate this assessment related to a typical HGV for aggregates. Larger HGVs for bulk materials / aggregates are available and SZC Co. has revised the HGV profile, as shown in Plate 4.2 of the Freight Management Strategy [AS-280] to take into consideration payloads of 27t for aggregate deliveries rather than the original 18.5t.

		The actual payload capacity of HGVs varies considerably depending on the type of material being transported. The daily HGVs arriving to site will constitute a mixed fleet ranging from 3.5t vans and flat beds (classified as HGVs in the CTMP (Doc Ref 8.7(A)) up to low loaders and 28t tankers. Therefore, the above assessments using an 18.5t per HGV payload will not reflect the actual HGV import of the project. In the 'Early Years' (Years 1 and 2) there will be a bias towards bulk materials when the rail and marine import infrastructure are available. Following this, as bulk materials will predominantly by imported by rail or marine the typical payload of the HGVs will drop. This has been taken into account in the HGV profile at Plate 4.2 of the Freight Management Strategy [AS-280].
	SCC Comment	**It is important to note that the total materials included in the Early Years do not include the figures associated with the associated development sites.** **The LHA notes that the theoretical HGV capacity available with daily HGV deliveries within both the early years and peak year caps will still provide enough transport to carry 12.1 million tonnes of materials necessary for the project. Thus the authority seeks greater controls on HGV movements as detailed in our Local Impact Report (LIR) report [REP1-045].** **Also there appears to be a mistake in the statement *'In the 'Early Years' (Years 1 and 2) there will be a bias towards bulk materials when the rail and marine import infrastructure are available. Following this, as bulk materials will predominantly by imported by rail or marine the typical payload of the HGVs will drop. This has been taken into account in the HGV profile at Plate 4.2 of the Freight Management Strategy [AS-280]'* as the marine and rail options will <u>not</u> be available in the early years.**
TT.1.12	ExQ to Applicant	Change to Percentage of Freight by Road

		Paragraph 2.1.15 [AS-280] reduces the freight by road to an anticipated 40%. Using the methodology in the above question how many HGV's does 40% by road equate to and how would that number be distributed over the construction period?
	Applicant Response	Table 2.1 of the Freight Management Strategy [AS-280] provides an indicative total material import of 12.1Mt. Using the anticipated 40% by road results in an expected tonnage of 4.84Mt by road. With the assumption of 18.5t per HGV this would equate to 261,620 HGVs. However, these would not be distributed evenly across the construction period and the actual payload will vary considerably from 3.5t to 28t depending on the material. The HGV movement histogram shown in Plate 4.2 of the Freight Management Strategy [AS-280] illustrates the forecast profile of HGVs over the construction phase based on 4 trains per day and the provision of the temporary BLF.
	SCC Comment	**The Applicant helpfully provides an estimate of total HGVs within their response of approximately 260,000 HGVs (520,000 movements). In reviewing the Hinkley Point C (HPC) Transport Review Group's reporting, SCC estimates that as of January 2021 there had been in the order of 170,000 HGVs (340,000 movements). It may be that additional information is available from HPC that would inform the likely level of materials and associated levels of HGV movements.**
TT.1.14	ExQ to Applicant	HGV - Associated Development Sites Table 2.1 [AS-280] shows the total expected import of materials for what is said to be the Sizewell C Project. From reading of the Materials Management Strategy [AS-202] it is assumed that this includes the materials required for the Associated Development Sites. Confirm the following: (i) Do the figures in Table 2.1 include all the Associated Development site material requirements; and (ii) Provide a breakdown of the quantities of materials for the main development site

		(iii) and for each of the associated development sites
	Applicant Response	(i) and (ii) The bulk material quantities in Table 2.1 [AS-280] are for the main development site and do not include associated development materials. (iii) The anticipated materials quantities for the associated development sites at the time of assessment are contained within: • Northern Park and Ride – Table 2.3 [APP-350] • Southern Park and Ride – Table 2.3 [APP-380] • Freight Management Facility – Table 2.3 [APP-511] • Two Village Bypass – Table 2.2 [APP-411] • Sizewell Link Road - Table 2.2 [APP-446] • Yoxford Roundabout – Table 2.2 [APP-480] • Other highway improvements – Table 2.3 [APP-480] • Rail – Table 2.1 [APP-541]
	SCC Comment	**SCC questions if the material quantities for the associated development are complete. The data given in Sizewell Link Road Table 2,2 [App-446] gives a total of 16,422 movements (below - assuming 18.5 tonne payloads) compared to a total of 24,869 HGV movements in TT.1.15. This may be due to movements related to earthworks. The applicant is asked to confirm this and also that if correct these movements have been included in the transport modelling.** **Material** **Tonnes** **Concrete** **1200** **Bitumen** **80000**

		Aggregate 70000 **Steel 600** **Other 100** **Total 151900** **No. of HGVs (18.5t): 16422**
TT.1.15	ExQ to Applicant	HGV Associated Development Sites The limits set out in the CTMP [APP-608] refer to HGV movements to the main development site. Provide: (i) The number of HGV movements by year to the associated development sites; and (ii) The yearly and total quantity of materials transported by HGV for the associated developments sites.
	Applicant Response	(i) HGV forecasts for the off-site associated development schemes have been produced. These forecast annual movements for the schemes as noted below: • Northern park and ride facility: - Year 1 – 3,068 movements (1,534 deliveries) - Year 2 – 178 movements (89 deliveries) • Southern park and ride facility: - Year 1 – 3,040 movements (1,520 deliveries) - Year 2 – 460 movements (230 deliveries) • Freight management facility: - Year 1 - 3,262 movements (1,631 deliveries) - Year 2 – 192 movements (96 deliveries) • Two Village Bypass, TVBP: - Year 1 – 3,680 movements (1,840 deliveries)

		- Year 2 – 5,538 movements (2,768 deliveries) • Sizewell link road: - Year 1 – 5,350 movements (2,675 deliveries) - Year 2 – 19,519 movements (9,760 deliveries) • A12/B1122 Yoxford roundabout: - Year 1 – 1,548 movements (774 deliveries) The anticipated material quantities for these schemes are summarised in TT.1.14.
	SCC Comment	**The Applicant sets out the forecast annual HGV movements associated with the AD sites; these are also set out at paragraph 3.3.6 of (REP2-054) the Construction Traffic Management Plan (CTMP).** **A comparison between TT.1.15 and the CTMP has been undertaken below:**

AD Site	CTMP Daily Average HGV movements	TT.1.15 Peak Year movements	TT.1.15 Average Daily Movements (based on 313 days)	TT.1.15 Average Daily Movements (based on 261 days)
Two Village Bypass	120	5,538	18	21
Sizewell Link Road	200	19,519	62	75
A12 / B1122 roundabout	20	1,548	5	6
Northern Park and Ride	42	3,068	10	12
Southern Park and Ride	42	3,040	10	12
FMF	42	3,262	10	13

It would be useful if the Applicant could explain the difference between the figures in each document, and on that basis whether the figures within the CTMP should be amended.

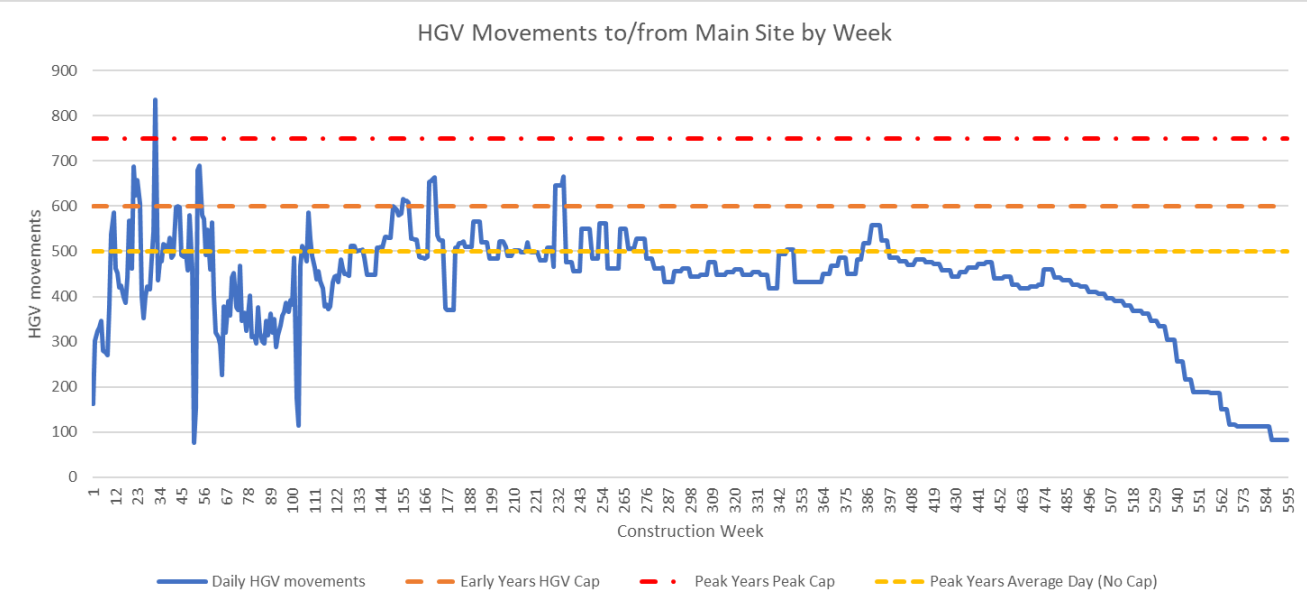
TT.1.16	ExQ to Applicant	Minimum HGV Numbers Plate 4.2 [AS-280] Provide the input numbers for this graph in a table and include any missing months at either end of the construction period.
	Applicant Response	An updated histogram showing the forecast 'Minimum HGV numbers over the construction period', has been produced based on the latest project detail and programme information as well as the proposed freight strategy of 4 trains per day and the temporary BLF. This replaces the previous profile shown in Plate 4.2 [AS-280]. As with Plate 4.2 [AS-280] the updated histogram includes all HGV movements for construction within the main development site, including: site establishment and enabling works within the main construction area, temporary construction area and LEEIE, Sizewell B relocated facilities, green rail route and rail sidings, accommodation campus, site accesses / adoptable highways works and the main permanent works construction. This update aligns with the project years and indicative construction schedule commencing in Year 1. It has been developed from the various resource loaded programmes, with input and learning for similar elements of work at Hinkley Point C during the construction phase, up until the end of Year 6. Due to the programme maturity, the forecast beyond Year 6 is indicative based on the evolving Sizewell C design and programme, with forecasting from Hinkley Point C. This is a gross, un-mitigated forecast which indicates several discrete periods where the HGV limits would be breached. However these periods will be controlled in accordance with the CTMP (Doc Ref 8.7(A)) and the peaks eased to stay within the daily HGV limits. The delivery management system secured via the CTMP (Doc Ref 8.7(A)) will allocate a set number of daily delivery slots which are aligned with the HGV limits. Therefore any forecast periods which exceed the HGV limits will not be permitted and will be levelled to fill the residual movement capacity either side of the peaks. The updated Plate 4.2 [AS-280] is provided within Appendix 24A of the written responses.

	SCC Comment	**The Applicant has helpfully provided additional information on the 'minimum HGV numbers over the construction period'. SCC has presented this information in the Graph below. As the Applicant notes, these figures are based on an unmitigated assessment and so in reality the figures will be managed by the CTMP to address those occasions where breaches of the caps are forecast (which are indicated in the graph). SCC considers the following points of particular note when reviewing the data:** • **The Early Years will in general see the peakier profile and worst HGV traffic (especially when considering that the HGV movements associated with the associated development sites are not shown). This is especially pertinent as whilst the Associated Development HGVs will be monitored, they do not have any caps proposed by the Applicant.** • **That for a significant period of the build the 'minimum number of HGV movements' sits just under the 'typical day' 500 movements profile meaning that there is a reasonable likelihood that the impacts would exceed the 'typical day' for extended periods of time unless proper mechanisms of control are put in place. As an example, if you look at each year in isolation you see the following average numbers:**

Year	Maximum	Minimum	Mean
1	836	76	461
2	690	114	375
3	600	372	485
4	664	370	**520**
5	666	456	**515**
6	550	432	475
7	504	418	450
8	558	450	488
9	476	418	453
10	460	380	418
11	368	116	252

These would indicate that the 'typical day' would be consistently breached for both Year 4 and Year 5.

- **The typical day may be being weighted by the last few years of the project which sees a tailing-off of the required number of HGV movements.**



A need for quarterly caps, as well as peak hour caps, and caps on each HGV route is set out in the LIR [REP1-044], as well as in SCC's D3 submission "Comments on any additional information/submissions received by D2".

TT.1.21	ExQ to the Applicant	Freight Modal Shares - Revised Freight Management Targets Provide: (i) Explanation of how the revised modal targets for freight management and HGV numbers will be secured within the DCO; A revised CTMP to reflect the updated Freight Management Strategy?
	Applicant Response	(i) Meaningful and effective assurance is best secured through limits on HGV movements. It is the movement of HGVs (rather than the modal split) which is of particular concern to the highway authority and to many local communities. HGV limits are measurable and enforceable. It would be more complex to provide for modal shares for rail and marine transport. Contracts for materials will be procured on a long term basis with suppliers in order to achieve best price and quality assurance but also so that suppliers can invest in the necessary infrastructure. Provisions for securing HGV limits are explained in response to question TT.1.22 of this chapter.
	SCC Comment	**The Applicant sets out that 'meaningful and effective assurance is best secured through limits on HGV movements' rather than imposing controls on modal share. This is considered reasonable in the context of controlling the impact on the highway network, but potentially may not be seen to be in the context of promoting sustainable development. SCC also considers that this should be seen in the context of the need for caps for the typical day, as the potential would exist for the Applicant to bring in additional materials by road and still be 'under the peak cap' meaning that they fail to achieve the modal split proportions indicated, whilst an average cap is likely to better achieve compliance and a more sustainable build by limiting this potential, as indicated in the LIR [REP1-044].** **It is also worth noting that there are no controls proposed on the routeing of HGV movements with regards to the 15/85 split between north and south on the A12; on that basis the potential exists for significant unassessed impacts, particularly to the north where HGV numbers could easily exceed the 15% assessed. On this basis controls on each route to/from the site should be included within the CTMP [REP2-054].**
TT.1.22	ExQ to the Applicant	Freight Management Strategy [AS-280] Paragraph 4.1.12 sets out the potential to reduce daily HGV movements during construction and Paragraph 5.1.4 sets out the potential to reduce freight transport by road to 40% of the total. Paragraph 5.1.5 states

		"The relative balance to be struck between transport modes can now be examined and, through this revised approach to its FMS, SZC Co. has provided the environmental, transport and practical information necessary to enable any necessary controls to be put in place to regulate the use of the proposed transport infrastructure to ensure that an appropriate balance is struck in the public interest." Explain: (ii) What controls are suggested to ensure target HGV numbers and sizes are limited to those assessed in the application; (iii) The monitoring process to ensure compliance; (iv) Remedial actions should HGV numbers exceed any limits set; and How such controls, monitoring and remedial actions will be secured within the DCO.
	Applicant Response	Provisions are proposed in Schedule 9 of the Deed of Obligation (Doc. Ref. 8.17(C)) to ensure the bringing forward of the associated development – including new roads, road improvements, the freight management facility, rail and marine infrastructure – in a timely manner. Collectively these elements of associated development represent a comprehensive package of measures designed to facilitate and mitigate the impact of the operation of each principal mode of freight transport. A greater marine capacity through the construction of a full scale jetty has been examined but ruled out on environmental grounds, whilst more rail capacity is not achievable without a scale of intervention that is not practical or deliverable. The application provides the tools to enable the policies of the NPS to be met – particularly paragraph 5.13.10 of EN-1 which prefers water-borne or rail transport where cost effective. Against this background: (i) The updated Construction Traffic Management Plan (CTMP) (Doc. Ref. 8.7(A)) contains limits on HGV movements and details of monitoring and reporting via a traffic monitoring report submitted to the Transport Review Group (TRG) quarterly or more frequently to monitor and ensure compliance with the terms of the CTMP. Monitoring provisions are explained in the updated CTMP (Doc. Ref. 8.7(A)), including the control inherent in the role of the freight management facility as a reporting, waiting and despatch site and the comprehensive nature of the delivery management system (DMS). The DMS is a virtual freight booking and tracking system, which will be used to monitor compliance with the CTMP (Doc. Ref. 8.7(A)). The DMS would enable compliance to be monitored with the HGV limits and timing limits as well as the tracking of HGV movements via GPS to/from the main development site to ensure compliance with the HGV routes.

		(ii) See above. (iii) The CTMP (Doc. Ref. 8.7(A)) makes clear the ability of the TRG to require corrective actions to ensure HGV numbers stay within the defined limits. Other measures available include a transport contingency fund which the TRG can direct be drawn down in the event that mitigation is required to address significant adverse transport impacts that were not mitigated through the DCO. The CTMP (Doc. Ref. 8.7(A)) is secured through the Deed of Obligation (Doc. Ref. 8.17(C)). Schedule 16 requires SZC Co. to implement the CTMP (Doc. Ref. 8.7(A)), which is annexed to the Deed of Obligation. Schedule 16 further requires SZC Co. to propose any necessary revisions to the CTMP for approval by the TRG if circumstances require.
	SCC Comment	**SCC considers that the controls proposed are insufficient, as detailed below in our response to the CTMP in our D3 submission "Comments on any additional information/submissions received by D2".**
TT.1.25	ExQ to the Applicant	Traffic Management Monitoring System (TMMS)/ Delivery Management System (DMS). Could the TMMS/ DMS be coordinated and developed to actively manage the following? (i) HGV movements to associated development sites; (ii) HGV movement to avoid sensitive periods in areas where impact might be high, e.g. schools, etc.; (iii) Light Goods Vehicle (LGV) movements and routes; (iv) Bus movements and routes; (v) Route monitoring to ensure that HGV numbers did not exceed those modelled on specific routes; and (vi) Currently the earliest and latest timings of freight movement to/ from the main site will be 07.00 and 23.00, however depending on origins and destinations HGV movements could be on the adjacent highway network for longer periods. In addition to on site monitoring of HGV timings, can HGV movements be managed so as to avoid much earlier and later disruption in sensitive areas?
	Applicant Response	The updated CTMP (Doc. Ref. 8.7(A)) provides details of the vehicle movements that will be managed and monitored via the DMS.

		(i) HGV movements to/from the associated development sites during their construction will be booked into the DMS and actively managed. A comparison of the actual movements with the assessed HGVs for the construction of the associated development sites will be included in the transport monitoring report provided to the Transport Review Group (TRG) for review. (ii) There are no schools on the proposed HGV routes during the early years or peak construction phase. HGV movements to/from the main development site are limited in terms of their arrival and departure at the start and end of the day in accordance with the assessment and adherence to the time limits will be actively managed through the DMS and reported to the TRG. (iii) LGV movements: LGV movements to/from the main development site will be booked into the DMS and actively managed. A comparison of the actual LGV movements with the assessed LGVs to/from the main development site will be included in the transport monitoring report provided to the Transport Review Group (TRG) for review. The Consolidated Transport Assessment (Doc Ref. 8.5(B)) includes evidence from Hinkley Point C to demonstrate that the level of LGV movements assessed to and from the main development site is robust. LGV routes: LGVs are not proposed to be tracked on their route to/from the main development site. The LGVs have been assigned to the highway network within the VISUM strategic model based on the observed distribution of LGVs in Suffolk. LGVs have route choice within the VISUM strategic model and therefore their impact has been assessed and mitigated. The number of LGVs to/from the main development site will be monitored to ensure it is within the assessed level of LGV movements. (iv) Buses will be routed on fixed routes in accordance with a timetable. The assessment of bus routes within the Consolidated Transport Assessment (Doc Ref. 8.5(B)) is based on the workforce profile and the distribution of workers based on the gravity model and provides a reasonable basis from which to assess the transport effects of the bus service. The bus strategy has been assessed for two points in time during the construction phase – the early years and the peak construction phase. In practice, the bus service will be aligned to the actual number of workers at any one time working on the Sizewell C project and the location of those workers. SZC Co. is committed to achieving the mode share targets in the Construction Worker Travel Plan (CWTP) (Doc Ref 8.8(A)) and to fund a bus service that meets the targets. Therefore, it is proposed to monitor compliance with the mode share targets rather than the number of buses provided.

		(v) The DMS will enable monitoring data to be provided to the TRG with regards to the number of HGVs on the HGV routes. (vi) The traffic modelling included in the Consolidated Transport Assessment (Doc Ref 8.5(B)) and the assessment of the environmental effects of Sizewell C traffic on the highway network in terms of transport, air quality and noise included in the Environmental Statement Addendum [AS-181 to AS-189] take account of the proposed arrival and departure times of HGV movements to/from the main development site and the effect on the surrounding highway network and receptors of the vehicles travelling on the wider highway network to/from the main development site during the hours before and after the time limits at the main development site. The delivery management system will provide delivery slots based on the proposed HGV movement and timing limits to ensure compliance with the controls set out in the CTMP (Doc Ref 8.7(B)).
	SCC Comment	**SCC notes that while the main site entrance is from Ransom Road, Farlingaye High School is situated immediately adjacent to the A12 in Woodbridge and bus access is from the southbound carriageway. The shared use cycleway adjacent to the A12 is used by pupils and national cycle route 1 crosses the A12 via the Toucan crossing midway between the Grundisburgh Road (B1079) and Woods Lane (A1151) Roundabouts https://osmaps.ordnancesurvey.co.uk/52.09685,1.31706,12**
TT.1.28	ExQ to the Applicant	Traffic Incident Management Plan (TIMP) [APP-607] In the case of the TIMP can this be extended to include management of emergency service responses in the event of: (i) Traffic incidents already covered in the plan; and (ii) Traffic delays created by movement of abnormal loads and their potential impacts on emergency services responses
	Applicant Response	(i) The Traffic Incident Management Plan (TIMP) (Doc Ref 8.6(A)) is a management plan, which sets out the protocols in the event of an incident within the Traffic Management Area. It focuses on how the TIMP ((Doc Ref 8.6(A)) will be activated, the communication between SZC Co. and the transport authorities and emergency services and the procedures that SZC Co. will follow in the event of an incident. The purpose of the

		TIMP (Doc Ref 8.6(A)) is not to replicate existing and detailed protocols already in place by the emergency services to respond to incidents on the highway network. (ii) It should be noted that there are a range of classifications of abnormal indivisible loads (AILs) depending on their width, length and weight. The level of delay on the highway network from AIL movements will be dependent on the AIL classification. The updated Construction Traffic Management Plan (CTMP) (Doc Ref (8.7(A)) provides a breakdown of the forecast number of AILs by classification and width. The majority (77% on average) of AIL movements by road will be 5m wide (1% on average). As set out in response to question TT.1.8 of this chapter, SZC Co. will seek to utilise any spare capacity in the permanent BLF to move the largest temporary construction AILs via the BLF rather than road and this would further reduce delay on the highway network. To further reduce the effect of AIL movements on the highway network, the CTMP (8.7(A)) sets out protocols for the management of AIL movements to and from the main development site by road. This includes the statutory notification of AIL movements to the authorities, including the emergency services, police escort requirements for wide/long loads and time limits for AIL movements to be moved outside of the network peak hours in order to reduce their impact both on general traffic and emergency service response times. In addition to the statutory notifications, the CTMP (Doc Ref 8.7(A)) sets out that the Community Safety Working Group, of which the emergency services will be members, will be provided with regular forecasts of AIL movements by road based on DMS bookings. The forecasts will be subject to refinement and confirmation but it will provide a helpful tool for emergency services forward planning. In addition, the two village bypass and Sizewell link road are being designed to cater for the AIL movements required for the Project and would bypass existing AIL constraints, such as the Farnham bend. For all these reasons, and the reasons set out in answer to (i), the movement of AILs is properly managed by the CTMP (Doc Ref 8.7(A)) rather than the TIMP (Doc Ref 8.6(A)).
	SCC Comment	**SCC has commented on the delays resulting from AIL movements in the LIR [REP1-044] paragraph 15.69 and in the response to TT.1.8 above and as noted in TT.1.32. We note that AILs predominately travel from Lowestoft and little mitigation is planned for the A12 between Yoxford and Lowestoft. Specific issues regarding AIL movements such as the management of these loads crossing the Darsham and Middleton Level crossing have been raised with the applicant and are under discussion.**

TT.1.29	ExQ to the Applicant	Construction Worker Travel Plan (CWTP)[APP-609] In the case of the CWTP explain the apparent anomaly of the total workforce on the main site of 1500 in Tables 3.1 and 3.2 for the early years mode of travel when in Plate 1.1 the chart shows a total workforce as high as 4000 at the end of construction of the Associated Development sites.
	Applicant Response	The workforce profile in Plate 1.1 of the Construction Worker Travel Plan (CWTP) (Doc Ref 8.8(A)) shows the total workforce profile for the construction phase, which is inclusive of the associated development construction workforce. It reaches around 4,000 workers towards the end of construction of the associated development sites. The early years assessment within the Consolidated Transport Assessment (Doc Ref 8.5(B)) is based on 1,500 construction workers travelling to the main development site (i.e. exclusive of associated development construction workers), which is expected to occur circa mid-Year 2. In addition to the 1,500 construction workers travelling to the main development site, the early years assessment includes a worst case assumption that all of the associated development sites will be constructed concurrently rather than phased, and assesses a total workforce of 730 workers constructing the associated development sites (i.e. a combined total of 2,230 construction workers for the construction of the main development site and associated development sites). The CWTP (Doc Ref 8.7(A)) sets out mode share targets for the early years and peak construction phases of the construction of the Project. The transport strategy for the construction workforce in the early years is based around the park and ride facility and caravan park at the LEEIE and an element of parking at the main development site, with parking permits and car sharing. The monitoring of mode share targets will move from the early years mode share to the peak construction phase mode share targets once the southern and/or northern park and ride facilities are operational. As set out in the updated Implementation Plan (Doc Ref 8.4I(A)), the southern park and ride facility is expected to be operational mid way through Year 2 of the construction phase. It is after this point that the main development site workforce is forecast to reach and start to exceed 1,500. Table 1.5 in Volume 2, Appendix 9A of the ES [APP-196] provides a breakdown of the construction workforce by year. It shows that mid-Year 2 there are estimated to be 1,410 construction workers at the main development site.

	SCC Comment	**It is worth noting that there are no controls proposed on the workforce numbers prior to the delivery of mitigation; the assessment assumes 1,500 workers; however, the potential exists for this number to increase prior to the delivery of relevant mitigation, most notably the accommodation campus and park and rides, this could lead to increased vehicle movements on the local highway network. However, the council also note that there are proposals to monitor vehicle movements at the main site; this would mean that additional workers would need to be moved by bus with associated monitoring of fly parking needed to be in place, as set out in the [REP2-054] Construction Worker Travel Plan (CWTP). Controls on workforce numbers or on the delivery of mitigation should be considered on this basis. However, it would be beneficial if the Applicant could outline the process for management of workforce vehicle movements on the basis that mitigation was not in place but the workforce had exceeded the 1,500 workers. There are also no controls on total workforce numbers (see paragraph 2.40 below).** **Table 2 in SCC's D3 submission "Comments on any additional information/submissions received by D2" sets out additional controls requested by SCC.**
TT.1.38	ExQ to Applicant	Change 15, New Bridleway Link between Aldhurst Farm and Kenton Hills Figure 2.2.32, of the ES Addendum [AS-202], shows the proposed new bridleway. Explain: (i) Why the former site access road junction is retained for what is assumed, after construction, to be a field access, including the right turning pocket; and (ii) How does the proposed bridleway and crossing relate to the desire lines for intended users in the area.
	Applicant Response	i) The secondary site access junction from Lover's Lane will only be in place during the construction of Sizewell C. Once construction of Sizewell C is complete, the junction and right-turn lane will be removed. ii) The new bridleway link between Kenton Hills and Aldhurst Farm has been proposed in order to provide a number of additional connections for non-motorised users (NMUs). It connects two recreational areas and enables pedestrians, cyclists and equestrians to move between Bridleway 19 and the new bridleway running south of Lover's Lane. The crossing location has been sited so as to provide good visibility between motorists and NMUs whilst also minimising deviation from NMUs' desire lines.

	SCC Comment	**(i) SCC as Local Highway Authority has advised the applicant that sequential plans are required to show the layout at the different phases of the project at this and other locations to clearly show the arrangement in the construction and operational phases.** **(ii) SCC welcomes the footpath / bridleway link from the diverted BW19 in Aldhurst Farm to Kenton Hills. Without this there would be no safe access to Kenton Hills by foot or cycle and the recreational area only reached by car.**
TT.1.50	ExQ to Applicant	Transport Assessment (TA) [AS-017] – Trip Generation, Distribution and Mode Share There is no replacement Table 7.1 in the TA Addendum [AS-266] so the following questions relate to Table 7.1: (i) The routeing of direct bus services is this correct for all services, including from Saxmundham and Leiston? (ii) How is the number of bus passengers derived? (iii) What is the peak number of buses required? (iv) How are LGV numbers derived? (v) How were the HGV numbers derived? and (vi) Why paragraph 7.2.1 [AS-266] states the only change relates to bus frequency but not overall HGV numbers?
	Applicant Response	(i) The routeing of the park and ride bus services is unchanged (i.e. using the A12 and Sizewell link road). However Table 7.1 should have been included in the Transport Assessment Addendum [AS-266] and refined to include that the Saxmundham direct bus service has been assessed to route via the B1119 and B1122 Abbey Road, and the Leiston route has been assessed to traverse the town centre and B1122 Abbey Road. In addition, as part of the refined direct bus strategy reported in the Transport Assessment Addendum [AS-266], the modelling assessed a direct service from Woodbridge using the B1438 route through Woodbridge and Melton, followed by the A12 and Sizewell link road. All routes are shown in Plate 7.1 of the Transport Assessment Addendum [AS266].

		(ii) For the Transport Assessment [AS-017] the total number of bus passengers using the park and ride services was calculated based on the forecast home location of construction workers derived from the gravity model. Construction workers would be allocated to the park and ride site closest to their home location (based on journey time). Further information is provided in the Gravity Model Technical Note, Appendix 7A of the Consolidated Transport Assessment (Doc Ref 8.5(B)). The gravity model originally assumed that 200 workers lived within the catchment of direct bus services from Ipswich and Lowestoft, which was based on professional judgement, as a conservative estimate. The gravity model also assumed all workers living in Leiston would travel to the site by direct bus service (934 workers). For the Transport Assessment Addendum [AS-266], the assessed direct bus strategy was refined based on the gravity model and the assumed number of workers living within walking distance of a direct bus stop. The analysis estimated that 447 workers in the gravity model would live within walking catchment of a direct bus service from Ipswich (151), Lowestoft (128) and Woodbridge (168). Following a review of the assessed routing of the Leiston direct bus service, it was concluded that the direct bus would be unlikely to serve workers living in Knodishall given the limited forecast demand. The removal of Knodishall from the Leiston direct bus service catchment reduced the number of workers travelling by direct bus from 934 to 895, a reduction of 39 workers, who instead have been assumed to drive directly to the main development site within the assessment. (iii) The assessment has modelled two points in time of the workforce bus strategy during the construction phase: early years prior to the southern park and ride facility being operational and peak construction when the construction workforce is at its peak and the southern and northern park and ride facilities are both operational. It is considered that the assessment includes a reasonable level of buses to assess the effects of Sizewell C traffic on the highway network. SZC Co. will appoint a bus operator to operate the Sizewell C bus services and will fund a bus service to meet the mode share targets included in the Construction Worker Travel Plan (CWTP) (Doc Ref 8.8(A)). Whilst the park and ride bus routes are fixed on the assessed routes, the timetable and number of buses will need to adapt in accordance with the workforce profile and shift pattern over time. As set out in (ii) the modelled direct bus services are based on the gravity model. The actual direct bus services will need to adapt to the workforce profile, location and shift pattern over time. The CWTP (Doc Ref 8.8(A)) requires the direct bus services to be approved by the Transport Review Group. The peak number

		of buses has been assessed to occur during the peak construction phase when the construction workforce is at its peak. The number of buses per day assessed for the peak construction scenario is: - Leiston direct bus: The traffic modelling has modelled 186 two-way bus movements per day between Leiston and the main development site. - Saxmundham direct bus: the traffic modelling has modelled 26 two-way bus movements per day. - Ipswich, Woodbridge and Lowestoft direct buses: The traffic modelling has modelled 72 two-way bus movements per day for each of these direct bus services. - Park and ride services: The traffic modelling has modelled 152 two-way bus movements from each of the northern and southern (iv) As set out in Chapter 7 of the Consolidated Transport Assessment (Doc Ref 8.5(B)), the early years traffic modelling assesses 250 two-way LGV movements to/from the development site. The peak construction traffic modelling assesses 700 two-way LGV movements, of which 525 two-way LGVs have been assessed to/from the main development site and 175 two-way LGVs have been assessed to/from the postal consolidation facility at the southern park and ride. The peak construction traffic modelling assesses 4 two-way LGV movements per day between the postal consolidation facility and the main development site. The LGV movements to/from the main development site has been derived based on experience at Hinkley Point C. Appendix 7D of the Consolidated Transport Assessment (Doc Ref 8.5(B)) provides a comparison of the assessed LGV movements to/from the main development site and Hinkley Point C data and demonstrates that the assessed level of LGV movements is robust. As set out in the CTMP (Doc Ref 8.7(A)), the vast majority if not all of the LGV movements to/from the postal consolidation facility will already be on the highway network making other postal deliveries. However, in order to provide a worst case assessment they have all been assessed as new trips on the network. The LGVs to/from the postal consolidation facility only account for 25% of total LGV movements on the highway network during peak construction. Evidence from Hinkley Point C is not available for post/couriers and therefore the level of LGV movements has been based on the construction team's experience of other major projects. park and ride facility per day. (v) Plate 4.2 of the Freight Management Strategy [AS-280] sets out the forecast HGV movements to/from the main development site during the early years and peak construction phase of the Project. Plate 4.2 [AS-280] has been updated in response to question TT.1.16. The HGV movements to/from the main development site

		has been developed from the various resource loaded programmes, with input and learning for similar elements of work at Hinkley Point C during the construction phase, up until the end of Year 6. Due to the programme maturity, the forecast beyond Year 6 is indicative based on the evolving Sizewell C design and programme, with forecasting from Hinkley Point C. (vi) Two scenarios were assessed in the Transport Assessment Addendum [AS266]: - the same assessment undertaken within the Transport Assessment [AS-017] based on 3 trains a day at peak construction but with refinements to the traffic modelling (refer to response to question TT.1.49); and - the assessment of the reduced number of HGV movements to/from the main development site associated with the preferred Freight Management Strategy (i.e. 4 trains per day and the enhancement to the permanent beach landing facility (BLF) and proposed temporary BLF. Section 7.2 of the Transport Assessment Addendum [AS-266] discusses the modelling refinement undertaken since the Transport Assessment [AS-017], which includes the refined bus strategy but no changes to the HGV numbers. Section 7.4 [AS-266] discusses the proposed changes to the freight strategy which includes reduced HGV numbers associated with the preferred Freight Management Strategy. These two assessments were presented separately in Sections 8.2 and 8.3 of the Transport Assessment Addendum [AS-266] respectively
	SCC Comment	**SCC accepts that the evidence provided from Hinkley Point gives a reasonable indication of the potential numbers of LGV movements; however, without controls on these movements, they represent a small risk to the overall assessment. As the level of movements are proposed to be monitored it is determined that this risk can be addressed through the TRG.** **Table 2 in SCC's D3 submission "Comments on any additional information/submissions received by D2" sets out additional controls requested by SCC.**
TT.1.61	ExQ to the Applicant	A12 improvements: A14 'Seven Hills' to A1152 Woods Lane.

		Explain how the development of this project takes account of the impact of the Proposed Development and also whether the submitted modelling of the Proposed Development takes account of any of the improvements planned.
	Applicant Response	A VISSIM micro-simulation model has been produced for the A12 corridor from Seven Hills to Woods Lane. This model includes a 2019 base year plus 2023 (early years) and 2028 (peak construction) forecast years which include a 'Reference Case' and a 'Reference Case + SZC' scenario. Full documentation was provided in Appendix 9C of the Transport Assessment Addendum [AS-266]. As part of the Brightwell Lakes consented development, junction upgrades are committed at: - A12 / A14 Seven Hills Interchange: signalisation (to be operational ahead of the 2028 forecast year). - A12 / Foxhall Road / Newbourne Road: partial signalisation (to be operational ahead of the 2028 forecast year). - New access junction on the A12 just north of Newbourne Road (to be operational by the 2023 forecast year). - A12 / Barrack Square: partial signalisation (to be operational ahead of the 2028 forecast year). - A12 / Anson Road: partial signalisation (to be operational beyond the 2034 forecast year). In accordance with Department for Transport (DfT) Webtag (TAG) guidance (Ref 3), the 2023 VISSIM models include the new access north of Newbourne Road and the 2028 VISSIM models include all of the upgrades with the exception of the Anson Road junction as this is not expected until beyond 2034. Suffolk County Council (SCC) is currently seeking funding for A12 improvements between Seven Hills and the A1152 at Melton through the Department for Transport (DfT) Major Road Network (MRN) fund. The proposed SCC MRN schemes are not committed improvements and have not been included within the VISSIM modelling. It should also be noted that, based on the A12 VISSIM modelling, no material impact on driver delay is predicted and therefore no mitigation in the form of highway improvements is considered to be required by SZC Co. for the A12 corridor between Seven Hills and Melton. Instead, Sizewell C traffic is proposed to be managed through the implementation of the transport management measures (i.e. TIMP (Doc Ref 8.6(A)), CTMP (Doc Ref 8.7(A)) and CWTP (Doc Ref 8.8(A)).

	SCC Comment	**As per SCC's response [REP2-192] to TT.1.82 at Deadline 2, the Council disagrees with the Applicant's conclusion that 'no material impact on driver delay is predicted'.**
TT.1.82	ExQ to SCC	Transport Assessment Addendum [AS-266] – Junction Modelling A12 Corridor Assessment. Paragraph 9.6.20 states that "Based on the VISSIM assessment, no perceivable impact is predicted and therefore no mitigation in the form of highway improvements is considered to be required for the A12 corridor between Seven Hills and Melton. SZC Co. will implement a Construction Traffic Management Plan and Construction Worker Travel Plan to monitor and manage the impacts of Sizewell C freight traffic and workforce movements during the construction of Sizewell C. A Transport Review Group (TRG) will be established to review these plans and review the monitoring report produced each quarter. A transport contingency fund will be made available to the TRG to be used if necessary, to implement any further mitigation measures and remedial actions." Do you agree with this analysis and the suggested approach to any necessary mitigation?
	Applicant Response	Based on the A12 VISSIM model, documented within Appendix 9C of the Transport Assessment Addendum [AS-266], it is concluded that Sizewell C impacts would not be significant on the A12 corridor from the A14 to the A1152. It should be noted that, the 650-HGV and 700-HGV figures in Table 9.55 and 9.56 had been accidentally swapped. The Consolidated Transport Assessment (Doc Ref 8.5(B)) includes the corrected results
	SCC Comment	**As per the SCC's response [REP2-192] to TT.1.82 at Deadline 2, the Council disagrees with the Applicant's conclusion that 'no material impact on driver delay is predicted'.**
TT.1.91	ExQ to the Applicant	Sizewell Link Road -Traffic Analysis In [APP-450] the consideration of the alternatives in paragraph 3.2.50 does say initial traffic modelling was done on alternative alignments but presents no findings. Table 3.1 does not have transport as a key environmental factor. Given routes further south could potentially provide alleviation of development traffic on other routes through Knodishall, Leiston and Saxmundham. Provide a more detailed response on the various possible route alignments with reference to the initial modelling undertaken and include any initial modelling assessment

	Applicant Response	SZC Co. HGV traffic will be on fixed routes and will be required to use the Sizewell link road, and therefore HGVs will not be travelling through the settlements of Knodishall, Leiston and Saxmundham. Routes further south are therefore not required to provide alleviation of any such HGV impacts. Similarly, the park and ride strategy is to intercept car trips on the A12 and to consolidate workers onto buses. The park and ride and direct buses would be assigned to the Sizewell link road, and therefore the park and ride buses will not be travelling through the settlements of Knodishall, Leiston and Saxmundham. Furthermore, a parking permit system is proposed to be restricted to workers living east of the A12 (outside of Leiston) and therefore car trips would only be travelling a relatively short distance and would be dispersed across the various villages. Car parking spaces are limited at the main development site to 1,000 spaces. The route selection exercise for the Sizewell link road was informed by an understanding of environmental factors. This environmental information, and the reasons why Route Z south was chosen, can be found in paragraphs 3.2.36 to 3.2.59 of Chapter 3, Volume 6 of the ES [APP-450]. Further background information on the route selection has also been compiled to assist the examination. This information is set out at Chapter 4 of the Sizewell Link Road: Principle and Route Selection Response Paper, which is at Appendix 5D of the written responses. However, as set out at paragraphs 4.1.64 to 4.1.72 of Chapter 4 of the Sizewell Link Road: Principle and Route Selection Response Paper, SZC Co. undertook a comparison modelling assessment of Route W North to Route Z, after Suffolk County Council (SCC) requested SZC Co. revisit Route W at the Stage 3 consultation. This modelling assessment expects that there would be 105 daily two-way SZC HDV flows on the A12 through Yoxford if Route W North was constructed (based on the Jan 2021 HDV flows), as HDVs would need to pass through Yoxford (on the A12) to reach the more southern alignment of Route W north. There would be 0 HDV flows through Yoxford if the Sizewell link road was constructed. Therefore, Route W North, and the other more southern alignments of Route X and Y, would not provide as much traffic relief to Yoxford compared to the Sizewell link road.
	SCC Comment	**The response provided by the Applicant does not consider the potential ability for a more southerly route to cater for worker movements during the operational phase reducing impacts on the A1094, B1069 and B1119, the potential benefits to offer a legacy benefit associated with non-development traffic travelling**

		from the south, nor given the additional distance for HGVs travelling from the south, the increased carbon footprint for these movements as a result of the more northerly alignment. The numbers of HGVs (105 at peak) although not assessed is unlikely to create severe impacts on the B1122, indeed this number is exceeded in the early years, and therefore HGVs could use the B1122 rather than travelling through Yoxford.
TT.1.92	ExQ to the Applicant	Sizewell Link Road -Traffic Analysis In the case of the preferred route of the Link Road a number of Relevant Representations question the legacy benefit of the proposed alignment. In Tables 8.5, 8.7 and 8.9 of the Transport Assessment [AS-017] it can be derived the traffic levels on the combined B1122 / Sizewell Link Road corridor return to early years levels on the B1122 during operation. Given this level of traffic is considered acceptable on the B1122 in the early years of construction, explain the legacy benefit of the proposed link road in this context?
	Applicant Response	The purpose of the Sizewell link road is to manage the impacts of the Sizewell C project, and specifically manage the impacts on the B1122 and local communities along the B1122. Retaining the Sizewell link road does create the opportunity for long term legacy benefit. Retaining the Sizewell link road would result in a permanent reduction in traffic for communities along the B1122. The Sizewell link road would also be particularly beneficial when statutory outages, and forced/un-planned outages, occur in the operational stage of the power plant. This permanent reduction in traffic for communities along the B1122, as a result of the Sizewell link road, also offers other benefits, including sustained improvements in noise and air quality, particularly in Theberton. Also, as the majority of traffic would reassign to use the Sizewell link road, the B1122 will experience much lower traffic volumes and could become more popular among cyclists, helping improve cycling connectivity in the immediate area. These long term legacy benefits of the Sizewell link road have been explained in response to question Al.1.33 in Chapter 5 of the written responses. The benefits of retaining the Sizewell link road are set out in more detail at Chapter 3, Section viii of the Sizewell Link Road: Principle and Route Selection Response Paper (paragraphs 3.1.130 to 3.1.134), which is included at Appendix 5D of the written responses.

	SCC Comment	**As set out in SCC's Written Representation [REP2-189], SCC considers that in transport terms, the net legacy benefit of the Sizewell Link Road post construction is very low, and must therefore be balanced against the ongoing cost of maintaining two parallel routes as well as the environmental harm caused by the physical presence of the Sizewell Link Road.** **The Written Representation [REP2-189] sets out clearly that, based on the Applicant's Transport Assessment, at the completion of the site (assumed here to be 2034), the traffic figures on the Sizewell Link Road return to a level that is far less significantly above the reference case for total traffic without Sizewell C.** **See also our comments to the Applicant's response to Al.1.33 above.**
TT.1.94	ExQ to the Applicant	Sizewell Link Road -Traffic Analysis 85% of HGV's are assumed from the south in the Transport Assessment. Using the same basis of analysis, for all remaining traffic including workers on the main site what is the proportion of traffic from the south of the Sizewell Link Road junction on the A12?
	Applicant Response	At peak construction, 42% of the assessed Sizewell C direct buses would travel on the A12 south of the Sizewell link road. Workers and LGVs < 3.5T would not use fixed routes as goods vehicles > 3.5T and buses would, and indeed there would be only a small number of worker vehicles using the A12/Sizewell link road junction during peak construction as most travelling from outside of the area bounded by the A12 and Rivers Deben and Blyth would use the park and ride sites or direct buses and not be permitted to drive direct to the main development site. Many workers living south of the Sizewell link road, within the A12 boundary and north of the River Deben, would not use this stretch of the A12 to travel to the site but would use local routes such as the B1119 or B1069. At peak construction, around 15% of Sizewell C worker (car) trips and 4% of LGVs are expected to travel on the A12 south of the Sizewell link road. In terms of the actual distribution of trip origins/destinations, regardless of whether or not they would travel on this stretch of A12 just south of the Sizewell link road, around 61% of Sizewell C worker vehicles (cars) and 73% of Sizewell C LGVs are assumed to be distributed, geographically, south of the Sizewell link road and A1120.

		Appendix 8D of the Consolidated Transport Assessment (Doc Ref 8.5(B)) contains traffic flow plots which show the distribution of Sizewell C traffic on the network.
	SCC Comment	**For the traffic distribution south of SLR, the Applicant's response does not mention that D2 route would ease pressure on B1069 and B1119.**
TT.1.95	The Applicant	Sizewell Link Road -Traffic on B1122 Given that traffic levels on some routes such as the B1122 are predicted to be highest in the early years (2023) ahead of completion of the mitigation schemes, explain why: (i) The works on the main development site are started in advance of all the mitigation projects being completed; and (ii) no mitigation is proposed on the existing B1122 to mitigate the increase in traffic during the early years other than highway maintenance.
	Applicant Response	(i) The works on the main development site are to be started as soon as practical following the grant of DCO and following the Final Investment Decision in view of the urgency of the project, the need to meet the policy expectation of deployment by 2035 and the need to bring forward the benefits of the project for the national, regional and local economy as soon as possible. The controls associated with the Implementation Plan will ensure that the Sizewell link road is operational at the earliest opportunity and that disruption caused by construction traffic using the B1122 is kept to a minimum. (ii) The response to this is set out in the paper on the early years strategy for the B1122 in Appendix 24C of the written responses.
	SCC Comment	**Monitoring and controls are needed to ensure that the impacts are kept to a minimum including through delivery of the associated developments on time to the Implementation Plan. The Applicant refers to Appendix 24C which indicates that an additional management measure to reduce impacts on communities along the B1122 is the delivery of the Park and Rides, and whilst SCC welcomes the earlier delivery of mitigation; this should also be seen in the context that additional bus movements would potentially increase the environmental impact (i.e. increased number of HDVs) rather than decrease the effect.**

		SCC also welcomes the Applicant's commitment to reopening discussions around potential enhancements along the B1122 to provide adequate short-term mitigation along the B1122.
TT.1.96	The Applicant	Sizewell Link Road - Pretty Road Vehicle Severance A number of Relevant Representations are concerned about the severance created by the loss to Pretty Road to vehicular traffic. Explain in detail why vehicle movement cannot be retained on Pretty Road?
	Applicant Response	SZC Co. acknowledges the concerns raised by local residents and discussions have been on-going regarding this matter during public consultation and since submission of the DCO application. Recent helpful discussions with SCC has confirmed that a vehicular bridge is viable in this location when combined with a reduction in speed limit. Although SZC Co. considers that the current DCO proposals would provide sufficient connectivity between Theberton and Saxmundham and would maintain access to Theberton Hall, SZC Co. does see merit in maintaining vehicular access along Pretty Road to assist with local connectivity and to enhance landowner access to fields either side of the Sizewell link road. In response to the concerns raised, SZC Co. is therefore intending to revise the Pretty Road bridge proposals so that vehicular access across the Sizewell link road in this location is maintained. SCC have been made aware of this intention and are supportive of the amendment in principle. Please see the Second Notification of Further Proposed Project Changes (Doc Ref. 9.27) submitted at Deadline 2 for further detail.
	SCC Comment	**SCC would not object to the modified proposals to Pretty Road bridge to enable use by motor vehicles. SCC insists that high quality pedestrian, cycling and equestrian facilities must be included in the design as this bridge is a vital link for NMU to avoid the severance created by the Sizewell Link Road. It is also noted that while changing the design to enable vehicles to use the bridge allows vehicle access between Theberton and Kelsale / Saxmundham it may also attract Sizewell C light traffic or local traffic leading to 'rat running' on the route and through Theberton. SCC brings to the Examiners' attention that Pretty Road and Moat Road are amongst a number of roads proposed to be nominated as Quiet Lanes.** **https://sites.google.com/view/quietlanessuffolk/status/notice-of-designation?authuser=0**
TT.1.109	ExQ to the Applicant	Freight Management Facility (FMF)

		Several Relevant Representations comment that closure of the A14 Orwell Bridge is a regular occurrence and this site would be severely affected by such a closure. Explain how this was considered in the analysis of the suitability of this site?
	Applicant Response	Refer to response to TT.1.17 with regards to the proposed two functions of the freight management facility. SZC Co. has needed to balance the requirements of the two functions of the freight management facility when selecting a preferred location. Given the primary day to day function of the freight management facility is to manage the release of HGVs onto the local highway network and undertaken compliance checks, the freight management facility has been located at the start of the local highway network where the A14 and A12 meet and to the south of Martlesham and Woodbridge, which are known to suffer from localised congestion. Any further north towards Sizewell and the facility would be less effective in responding to sensitivities on the A12. The freight management facility is already over 40km away from the main development site and locating it even further away from the site (i.e. west of the Orwell bridge) would impact on the operational ability of the facility to so closely control HGV arrivals at the main development site. The secondary, and far less frequent function of the freight management facility, is to enable HGVs to be held in the event of an incident on the highway network, which forms part of the management measures included in the Traffic Incident Management Plan (TIMP) (Doc Ref 8.6(A)). The TIMP (Doc Ref 8.6(A)) sets out the protocols to be followed by SZC Co. and relevant stakeholders in the event of an incident on the highway network. The closure of the Orwell bridge is just one of these scenarios. Orwell Bridge closure would only prevent inbound HGV traffic reaching the freight management facility. In the event of a bridge closure, SZC Co. would contact any deliveries en-route to the freight management facility through the DMS and the drivers would be required to park and wait until the bridge is reopened before continuing their journey. SZC Co. is in discussions with Highways England to agree suitable locations west of the Orwell bridge for HGVs to be required to wait. It is also important to note that from discussions with Highways England the frequency of bridge closures should be less as they have recently implemented management measures. Given the freight management facility is best placed for its primary function east of the Orwell Bridge, and the DMS controls the flow and movement of HGVs to the west of the Orwell Bridge, no alternatives west of the bridge were considered in detail. The Site Selection Report [APP-591] and Volume 8, Chapter 3 (Alternatives

		and Design Evolution) of the ES [APP-514] for the FMF in the original DCO Application explain the site selection process in more detail.
	SCC Comment	**SCC considers that a location to the west of the Orwell Bridge would have been preferable to manage traffic during closures of the Orwell Bridge, although recent improvements by Highways England has reduced the risk of this for high winds, but not other incidents. A location west of the Orwell Bridge would also remove trips to and from the A1156 exit on the Seven Hills Interchange. While the Applicant are in discussion with Highways England regarding suitable waiting locations south and west of Ipswich, SCC is aware that there is already considerable demand for such facilities, for example by HGVs travelling to Felixstowe and Harwich. In the Applicant's response it is noted they acknowledge that the A12 south of Woodbridge is known to suffer from localised congestion.**
TT.1.110	ExQ to the Applicant	Freight Management Facility (FMF) Also, in relation to the FMF provide: (i) The peak times of activity for HGVs entering and leaving the site; and (ii) The anticipated direction of travel of the vehicles entering and leaving the site
	Applicant Response	(i) Between 6-8 am are expected to be the busiest hours of arrivals at the freight management facility, and 7-9am for departures (i.e. heading on to the main development site). (ii) The assumed distribution of HGVs at the main development site is 85% from the A12 south / 15% from the A12 north. HGVs arriving from the south would use the freight management facility en-route to the main development site. HGVs arriving from the north would not route via the freight management facility due to the extent of the diversion on their route to the main development site. However, all HGVs to/from the main development site will be tracked via GPS to monitor compliance with the HGV routes. The 85% from A12 south is made up of 15% from Felixstowe Port, 10% from Ipswich Port and 60% from London/the South East. These HGVs would be required to stop at the freight management facility prior to arrival at the main development site, which equates to 17.6% of HGVs approaching from the Felixstowe area (15/85) via A14 east/Seven Hills/A1156 and turning left into the freight management facility, and 82.4% (70/85) approaching from the A14 west/Seven Hills/A1156 and turning left into the freight management

		facility. All HGVs leaving the freight management facility would exit right onto the A1156 and straight across Seven Hills to the A12.
	SCC Comment	**The Applicant sets out the peak arrival and departures for HGV movements and routeing of HGV movements to/from the Freight Management Facility. It is worth noting that the CTMP (REP2-054) only contains controls on the total number of HGV movements and on the number of HGV movements during the peak hours of 08:00 to 09:00 and 17:00 to 18:00. SCC believe that limits should be put on each route; to reflect the proportions assessed within the ES (i.e. the 85/15 split) and on the adjacent peak hours of 07:00 to 08:00 and 16:00 to 17:00; which in some localised areas can often be the network peak hours, to reflect those HGV numbers modelled within the assessment, as set out in the Councils LIR (REP1-045). Controls at Hinkley Point C include caps for each of the two HGV routes to the site, as well as caps on three morning peak hours and three evening peak hours, which have, in general, not been exceeded, aside from a few incidents. This would limit impacts on the highway network during the most critical periods for network capacity.**
TT.1.118	ExQ to the Applicant	ES CHAPTER 10 [APP-198] – TRANSPORT Explain why given the major adverse impact on pedestrian amenity which is considered a significant effect that no mitigation is proposed on sections of the B1122 in the early years of construction prior to the opening of the Sizewell Link Road
	Applicant Response	Refer to response to question TT.1.95.
	SCC Comment	**SCC is committed to further discussions with the Applicant on this matter, as per TT.1.95 above.**
TT.1.120	ExQ to the Applicant	ES CHAPTER 10 [APP-198] – TRANSPORT Paragraphs 10.6.14 to 10.6.17 identify four routes in the early years that are said to have adverse impacts that are identified but none are judged to be significant effects. This in the case of 3 routes is said to be because in the selected representative hour, other activity of the routes would be relatively light. Has the hour of greatest impact been considered in regard to severance when there is likely to be much more activity on these sensitive routes?

	Applicant Response	The assessment has been updated since the submission of the Volume 2, Chapter 10 of the ES [APP-198]. Volume 1, Chapter 2 of the ES Addendum [AS-181] was based on the refined traffic modelling and therefore the environmental effects for the links referred to in this question should be based on the ES Addendum [AS-181] and not the ES [APP198]. Please refer to response to TT.1.112 with regards to the further assessment undertaken for some links for the hour of highest environmental impact, which is summarised in Appendix 24D of this chapter.
	SCC Comment	**SCC is considering the content of Appendix 2D and whether the impact at 07:00 to 08:00 hours still needs to considered (i.e. whether it is a legitimate hour to consider vulnerable road user movement from education facilities).**
TT.1.123	ExQ to Applicant	ES ADDENDUM [AS-181] – Severance 2023 Early Years Paragraph 2.5.23, has the hour when children are likely to be arriving or leaving the Centre and nursery been considered, i.e. the hour of greatest environmental impact?
	Applicant Response	Refer to the response to TT.1.112 within this chapter and the additional assessment in Appendix 24D of the written responses for the hours of greatest environmental impact for a small number of links, including Link 6, B1119 Saxmundham Road in Leiston, which is referred to in this question.
	SCC Comment	**SCC is considering the content of Appendix 2D and whether the impact at 07:00 to 08:00 hours still needs to considered (i.e. whether it is a legitimate hour to consider vulnerable road user movement from education facilities).**
TT.1.125	ExQ to Applicant	ES ADDENDUM [AS-181] – Amenity 2028 Peak Construction Busiest Day Paragraphs 2.5.64 and 2.5.65 the assessments of amenity are based on revised traffic modelling and assumptions about bus routes. How will these bus route assumptions be controlled through the DCO to ensure any subsequent changes in bus routes does not reintroduce effects that have not been considered or screened out.

	Applicant Response	The assessment in paragraphs 2.5.64 – 2.5.65 of Volume 1, Chapter 2 of the ES Addendum [AS-181] is expressly undertaken on the basis of reasonable assumptions and recognises that actual routeing of direct buses will be agreed via the Transport Review Group (TRG) processes (see text within paragraph 2.5.65 [AS-181]). This is consistent with regulation 14(3) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which requires inclusion of "the information reasonably required for reaching a conclusion on the significant effects" (emphasis added). It is neither practical nor desirable for the direct bus routes to be fixed at this stage without the ability for the Transport Review Group to consider and refine them based on the actual location of construction workers and the number of workers over time. The Construction Worker Travel Plan (CWTP) (Doc. Ref. 8.8(A)) provides for initial approval and subsequent refinement of bus timetables and routes by the TRG.
	SCC Comment	**SCC welcomes the commitment that the actual routeing of direct bus routes will be agreed through the TRG. SCC seeks further explanation of how this is controlled and monitored through the most recent (REP2-055) Construction Worker Travel Plan (CWTP). SCC would also recommend that this include controls on total bus movements (for direct and park and ride bus movements) through the Transport Review Group, to ensure impacts do not exceed those assessed.** **Table 2 in SCC's D3 submission "Comments on any additional information/submissions received by D2" sets out additional controls requested by SCC.**
TT.1.128	ExQ to Applicant	ES ADDENDUM [AS-181] – Driver Delay 2028 Peak Construction Paragraph 2.5.89, explain how is this level of delay judged to be not significant in this case?
	Applicant Response	The level of delay stated in paragraph 2.5.89 of Volume 1, Chapter 2 of the ES Addendum [AS-181] was incorrect due to a mistake with the headings in tables 9.55 and 9.56 of the Transport Assessment Addendum [AS-266], which has been corrected within the Consolidated Transport Assessment (Doc. Ref. 8.5(B)). The 650 HGV and 700 HGV travel times had been swapped. Paragraph 2.5.89 should read [AS-181]: "The journey time analysis from the VISSIM micro-simulation model of the A12 corridor demonstrates that the journey time increase on the A12 northbound, between Seven Hills and just north of A1152, is predicted to be 11-42 seconds depending on the hour and 0- 29 seconds in the southbound direction depending on the hour.

		Over a 14km route, the effect on journey time on this part of the A12 would be negligible, which is not significant." Despite the small change in impacts presented, the conclusion that this would be negligible and not significant is still considered to be correct. These increases in journey times over a 14km route are not considered to be significant.
	SCC Comment	**As per our response to TT.1.82, SCC disagrees with the Applicant's conclusion on the significance of impact on this corridor.**
TT.1.132	ExQ to Applicant	Cumulative Transport Impacts [ES-201]- Appendix 10.4 Scottish Power in the assessment of the transport impacts of both EA1 North and EA2 have identified the following area of mitigation required. Provide explanation why in the assessment of the effects of Sizewell C traffic, the following mitigations are not identified: (i) For the EA projects only footway improvements in Theberton on the B1122; (ii) Cumulative impact with SZC pedestrian improvements at Yoxford on the A12; and (iii) Cumulative impact with SZC pedestrian improvements at Marlesford on the A12
	Applicant Response	SZC Co. is committing to substantial highway mitigation infrastructure embedded within the scheme proposals (e.g. Sizewell link road, two village bypass, freight management facility, park and ride facilities etc). In addition, SZC Co. has also identified significant mitigation funds which will be secured through the Deed of Obligation (Doc. Ref. 8.17(C)). Mitigation is proposed at all three locations identified in the question and is summarised as follows: (i) SZC Co. proposes the construction of the Sizewell link road running generally in parallel with the B1122 to mitigate potential peak construction impacts on communities along the corridor, including Theberton. SCC and ESC are developing proposals to adapt the B1122 into an active travel corridor prioritising cycling and walking. SZC Co. are supportive of the creation of an active travel corridor along the B1122 and keen to work

		with SCC and ESC to bring about those cycling and walking improvements on the B1122, which would be enabled by the completion of the Sizewell link road. See also the response to question TT.1.95 of this chapter. (ii) SZC Co. proposes to upgrade the A12 / B1122 junction from a priority ghost island T-junction to a three-arm roundabout (referred to as the 'Yoxford roundabout') to increase traffic capacity. Proposals incorporate new and wider footways tying into the existing pedestrian network. (iii) Mitigation is proposed at Marlesford, to be delivered by SCC through the Marlesford and Little Glemham Improvement Fund, secured via the Deed of Obligation (Doc. Ref. 8.17(C)). See response to question TT.1.99.
	SCC Comment	**SCC is currently working with the Applicant to address our concerns regarding the Environmental Statement and this will help inform conclusions on required mitigation including in the cumulative scenario.**