The Planning Inspectorate

Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for The Sizewell C Project

The Examining Authority's written questions and requests for information (ExQ1)

ExQ1 Part 6 of 6

ExQ1	Question to:	Question:
Chapter 23 - SE.1 Socio-economic		
SE.1.0	All relevant local authorities	**Assessment of Socio-Economic Effects** The NPS at paragraph 5.12.3 sets out what an assessment of socio-economic affects should cover. Are there any shortcomings within the assessment that require further assessment or clarification?
	Response by SZC Co. at Deadline 2	No response from SZC Co. is required.
	Response by East Suffolk Council at Deadline 2	NPS 5.12 8 states that 'The IPC should consider any relevant positive provisions the developer has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.' 5.12.3 states this assessment should consider all relevant socioeconomic impacts, which may include: ● the creation of jobs and training opportunities; ● the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; ● effects on tourism; ● the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and ● cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region. LIR [REP1-045] 23.7 and 23.8 states *'The Applicant and its contracted supply chain partners must work transparently and collaboratively with the Councils, and its partners*

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		across Suffolk and Norfolk, to ensure that the region capitalises on the opportunity presented by Sizewell C and that the value in and to local communities is maximised…. Adequate financial mitigation is required to deliver the economic benefit to the local area….' These information gaps have persisted through to the final consultation stages, in the material provided for at Stages 3 and 4. The outstanding information requested by the ESC and SCCs at Stage 3 or Stage 4 but still outstanding at the time of submission include: • Evidence of the impact of and resulting mitigation proposals for the increase of workforce number to 8,500. It therefore is imperative that the Applicant provides the missing information identified above and has an additional focus on positive provisions and legacy benefits. A Statement of Economic Intent has been developed by ESC, SCC, and New Anglia LEP which represents the agreed vision of partners working together with the Applicant. The highlighted areas of focus are Business Support, Supply Chain, Inward Investment, Visitor Economy, Education, Skills and Employment, Community, Infrastructure and Environment. Some of the issues addressed by the Statement of Economic Intent are being addressed via current Section 106 proposals. Partners are working together to seek the best possible outcomes from S.106 and other commitments made by the Applicant. Some key issues have already been agreed. However, there are gaps and to manage Economic Development matters with single focus and careful coordination across all the partners a comprehensive Economic Development programme must be created. This programme is required to avoid duplication, inefficiency, and gaps and to coordinate work to maximise opportunities and create legacy benefits. The gaps exist between current provision and issues under negotiation. These gaps include development of specialist functions to create focus on key issues and provision of specialist support services to ensure that businesses receive the help they need. Expert functions should be created across each of New Anglia LEP, SCC, and East Suffolk Council. These functions should be focussed on inward investment (1), business support (2) and economic development programme management (1).

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		Specialist services should be focussed on investor attraction and development (New Anglia LEP), and business support (New Anglia LEP and ESC).
	Response by Leiston Town Council at Deadline 2	SE.1.0 Assessment of Socio-Economic Effects Although the assessment of socio-economic impacts appears comprehensive in the number of issues and locations it covers, the report acknowledges a high degree of uncertainty involved in the projections. Having identified many potential adverse effects on housing, social services and community cohesion – for example – the summary then assesses these as negligible or insignificant. Socio Economic impacts on the town of Leiston itself are complex and numerous and much emphasis has been put on the Section 106 agreement to help mitigate the adverse effects of social integration and anti-social behaviour. The S106 does not adequately spell out how this will be addressed. **Employment** Our town has seen the effect of nuclear build twice before - and in the not too distant past as host to the most recent generation of reactor, which many local people still remember. The economy thrived during the build, then fell quickly afterwards and has only seen recovery since the closure of Sizewell A. Much emphasis is being made about employment for local people, but most of these roles are likely to be in the lower skills sector to support the contractors (e.g. catering, cleaning, administration) and not the highly skilled roles that will undoubtedly move over from HPC. And they will be transitional. How will the gradual loss of this employment towards the end of the build be addressed by the applicant? The hospitality, farming and social care sectors have huge concerns about the drain of local people from their businesses, especially as workers from the EU are not as available since our departure. How will the applicant assist these sectors in back-filling the roles lost to the construction site? **Anti-social behaviour** Sports facilities were originally intended to be positioned within the campus but are now being proposed within the town, at the school. The caravan site is also positioned close to the town and residents' homes. Siting the sports facilities on the campus and the caravan park within the construction site red line would have keep contractor footfall within Leiston to a minimum and away from the school. Leiston Town Council would like more evidence

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		that the code of conduct would ensure anti-social behaviour while contractors are moving within the town, will be addressed. We recognise that the facilities are a legacy benefit, but not for many years. SZC will effect an entire generation of school students and their families and this must be taken into account. Unlike the much larger town of Bridgwater, where there are already leisure facilities, the contractor numbers cannot easily be absorbed into the current population. We are yet to see a draft code of conduct tailored to the particular needs of Leiston. **Health and Welfare** The draft S106 agreement references mitigation for any shortcomings in the health and welfare of our community during construction but there is no definite proposal. We would like to see evidence of how the applicant is engaging with the local NHS Trust to address this.
	Response by Suffolk County Council at Deadline 2	SCC considers that the requirements of the NPS is appropriate. However, there are shortcomings in the assessment the applicant has produced. In the cumulative assessment against other significant construction projects in the region. Within this project the very basic methodology used for cumulative labour market impacts does not take into account the different skill sets needed to deliver at particular phases of the project and only concentrates on construction labour. See LIR [REP1-045] para 32.44-32.45, as well as para 25.15. Information gaps have persisted throughout consultation stages and in the final submission. These include, • Evidence of the impact of and resulting mitigation proposals for the increase of workforce number to 8,500. • Clear definition of "home based worker". • Clear definition of a "worker". • Clear definition of a "local business". We note that the lack of clarity on the definitions was highlighted as a shortcoming in the Hinkley Point C monitoring in the Oxford Brookes Study commissioned by the New Nuclear Authorities Group (See table 32 in the LIR [REP1-045] and LIR Appendix 2:1 [REP1-089]). It therefore is imperative to seek the missing information above and have an additional focus on positive provisions and legacy benefits

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 3	***Evidence of the impact of and resulting mitigation proposals for the increase of workforce number to 8,500*** Please see **SZC Co.'s Response to the ExA's First Written Questions** [REP2-100] – particularly **G.1.24, SE.1.33** and **SE.1.17** which set out that: - the increase in the workforce between Stage 2 of the pre-application consultation and the DCO application submission has been assessed as an increase in non-home based workforce in order to provide robust mitigation for the effects that a non-home based workforce would generate; - this does not preclude the residual home based workforce number being exceeded and indeed information from Sizewell B and Hinkley Point C suggest it may be exceeded, particularly given the suite of employment, skills, education and supply chain measures to be secured by **Schedule 7** of the **Draft Deed of Obligation** (Doc Ref. 8.17(D)); and SZC Co first introduced the change from a 5,600 (+600 workers at associated development sites) peak workforce to a 7,900 (+600 workers at associated development sites) peak workforce at **Stage 3 Consultation** in the **Development Proposals** document (Volume 1, Chapter 4) in January 2019 [APP-074] and since then has used the conservative assumptions regarding the uplift as all NHB (referred to above) in discussions about impact assessment and mitigation across all socio-economic aspects. A key area of effect in this regard is accommodation and housing – and as set out in Table 2.2 of the **Accommodation Strategy** [APP-613], the effect of the higher workforce on accommodation was first discussed in March 2019. ***SZC Co Consideration of ESC 'Statement of Economic Intent'*** Please refer to **SZC Co.'s response to the Local Impact Report (Chapters 23, 24 and 25)** (Doc Ref. 9.29) in particular **Section 23.3** of **Chapter 23**. This sets out that, in terms of the Councils' proposals for economic development (**Annex D** to the **Local Impact Report** [REP1-049]), SZC Co. considers that this reflects a largely sensible and pro-active position for the Councils' economic development function and identifies the substantial opportunities for the region to benefit from the Sizewell C Project. In some cases, it provides good examples of the outcomes that can be achieved through effective

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		use of measures to be secured under **Schedule 7** of the **Draft Deed of Obligation** (Doc Ref.8.17(D)). SZC Co. notes that **Annex D** [REP1-049] refers to the Norfolk and Suffolk Economic Strategy which outlines the aim "*to maximise the opportunities associated with the proposed Sizewell C nuclear power station in terms of supply chains, employment and skills opportunities and inward investment"*. This suggests that the Councils have a policy direction to undertake activities themselves to maximise the Project's opportunities. SZC Co. wishes to note that it plans to work collaboratively with the Councils and other economic development partners to help the Councils achieve their economic objectives. SZC Co. will engage further with the Councils to understand whether there is an evidenced need for additional funding for economic development resource and business support. SZC Co. considers that the economic effects of the Sizewell C Project are demonstrated (in line with NPS EN-1) to be overwhelmingly positive. Where there is an identified risk of adverse effects – such as vacancies being harder to fill – these have been addressed and appropriate mitigation has been identified as part of a detailed and extensive suite of measures, supported by information-led Workforce Development Strategies and regular review, Implementation Plans and monitoring to ensure that the Project enhances its benefits in terms of supply chain, skills, education and employment activities. Together, these initiatives have the benefit of avoiding risks of adverse effects, ensuring that the Project is delivered effectively, ensuring that effects related to NHB workers are minimised, and supporting the region's skills infrastructure for the benefit of the Project and other regional demands on labour by delivering a pipeline of legacy skills. ***Cumulative Effects (skills/labour market)*** SZC Co. has provided a response to the **ExA's First Written Questions (ExQ1s)** [REP2-100] including **SE.1.39**, and has included an appendix to that response (**Appendix 23B**, REP2-112) which provides clarity with regard to the scope of the EIA cumulative assessment for socio-economics. This includes a breakdown of Civils and Mechanical, Electrical and Heating (MEH) /other skillsets for the projects within the scope of the EIA cumulative assessment, and an explanation as to the list of cumulative projects included.

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		This sets out that the cumulative projects would not result in a significant additional demand for labour, and this conclusion remains when assessing for specific skill sets, where appropriate estimates are available. Nonetheless, SZC Co. recognises that there is a need for the region to address and plan for the demand for civil and MEH construction skills, and has developed a set of initiatives set out at **Schedule 7** of the **Draft Deed of Obligation** (Doc Ref. 8.17(D)) to support the region's ability to deliver skills. Critically this includes: • funding for a Regional Skills Co-ordination Function (RSCF) that will support both the Project and the wider regional infrastructure construction sector over the Sizewell C construction period; • funding for skills and training providers via an Asset Skills Enhancement Capability Fund (ASEC) Fund which will be directed by the RSCF using Annual Workforce Delivery Implementation Plans to deliver the pipeline of skills needed for the Project, and through match funding, for similar skillsets needed for wider infrastructure projects; and • a commitment to detailed Workforce Delivery Strategies for each phase of construction, enabling the region to fully understand the scale of opportunity at each phase and direct funding towards initiatives that avoid adverse effects and promote positive ones. ***Definitions / Clarity*** SZC Co. has included a set of definitions within **Volume 2, Chapter 9** of the **ES** [APP-195]. SZC Co. will discuss this further with the Councils to ensure that the definitions are clear and understood and are appropriate for monitoring purposes. In terms of specific clarifications: ***Definition of Home-based (HB) and Non-Home-Based (NHB) Workers*** **Paragraph 9.4.56** of **Volume 2**, **Chapter 9** of the **ES** [APP-195] defines NHB workers as: *Workers who retain a home address outside of the 60-minute area, but move to the area temporarily (likely returning home between working periods) in a range of short-medium term accommodation.*

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		Though not explicitly stated, this definition (which totals c. 5,900 at peak) also contains those workers that move their single address explicitly to work on the Project (i.e. do not retain another property in the area). These workers can be considered home-based in that they would not be in receipt of subsistence allowance, and do not have a permanent home elsewhere. However, these workers are included in the NHB category within the assessment in order to capture the 'worst case' in terms of their potential influence on accommodation and public service effects. **Paragraph 9.4.56** of **Volume 2, Chapter 9** of the **ES** [APP-195] identifies HB workers as *Workers who already live within 90 minutes of the site.* This is effectively the residual workforce once discounting the NHB workforce as defined and clarified above (where that definition actually includes the HB workers moving explicitly for work on the Project category). As such, this is a conservative estimate for HB workers (in terms of the benefit of employment) as it doesn't include people who move from e.g. Ipswich to Leiston permanently and explicitly for work on the Project. Further discussion is required between SCC, ESC and SZC Co. on the appropriate definition of worker types for the purpose of the Deed of Obligation and for determination of appropriate monitoring requirements for socio-economic effects in order to set a robust and longitudinally consistent approach to monitoring, reporting on and reviewing effects to direct mitigation. ***Definition of Local Business*** The set of definitions within **Volume 2, Chapter 9** of the **ES** [APP-195] does not include the definition of a 'local business'. SZC Co. is engaging with the UK Government to determine the definition of 'UK content', and will consider an appropriate definition of 'local content' in light of that engagement. ***Definition of Worker*** In line with standard practice, a 'worker' is defined using the 'five day rule' – meaning people who spend at least five days working on the site in a given month. This enables the distinction of workers who may generate the potential for socio-economic effects, e.g. on housing or public services, from visitors. This therefore does not include 'visitors' to the site. There may be up to 7,900 workers at peak.

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		The intention is to be able to use a nationally recognised approach from major infrastructure projects to report the number of genuine workers whilst removing ambiguities resulting from: • daily fluctuations; • alternating shift patterns; • temporary work scopes; • peaks and troughs of activity; and • other related statistical issues. **Comments raised by Leiston Town Council** **Volume 2, Chapter 28** of the **ES** [APP-346] sets out the assessment on health and wellbeing and mitigation measures proposed. Mitigation includes measures proposed within the air quality, noise and vibration, radiological, transport and socio-economic assessments, as well as an occupational health service (to avoid workers using local healthcare capacity) and a residual healthcare contribution. A Community Fund is also proposed for the purpose of mitigating the intangible and residual impacts of the Project on the communities in the Area of Benefit, which will include Leiston (see **Draft Deed of Obligation**, **Schedule 14** (Doc Ref 8.17(D)). A Health Working Group which includes the Councils, Public Health Suffolk and the Ipswich and East Suffolk Clinical Commissioning Group has been established for several years. Attendees include a GP from The Leiston Surgery (also covering the Yoxford Branch Surgery) and another from Saxmundham Health. SZC Co. has set out how the Project effects and embedded mitigation and additional mitigation secured by the DCO and Deed of Obligation would lead to changes in Leiston in response to **Question CI.1.11** [REP2-100]. SZC Co. considers that effects on social integration and anti-social behaviour would be mitigated by a range of measures including but not limited to the Worker Code of Conduct and security vetting process, the provision of sports facilities in Leiston, improvements to Leiston's town centre, and wider measures such as the Public Services Resilience Fund, contributions to Suffolk Constabulary, and the Community Fund. The Project would provide a range of employment opportunities for local people across different sectors and skills. Lower skilled jobs are more local by nature, as average travel distances are lower, and labour market more abundant. However, SZC Co. has set out a

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		range of measures including outreach activities, a bursary, a Jobs Service, Young Sizewell C and funding for local education and skills/training providers via an Asset Skills Enhancement Capability Fund that would be directed towards improving social mobility to provide a regional skilled workforce for this Project and the legacy skill demands of the region. These are accompanied by a governance function that would direct the measures towards areas including Leiston. These measures will be aimed at supporting upskilling to enable residents to gain employment and sustainable careers beyond the Project's construction phase. This focuses on 'legacy skillsets' that are needed both by the Project and the wider regional suite of infrastructure projects. SZC Co. does not agree that the Project would result in displacement, but may result in increased labour market churn and some vacancies being harder to fill. The employment, skills and training measures – along with supply chain measures also set out in the Draft Deed of Obligation – are intended to reduce that risk. Fundamentally, the Project would provide thousands of jobs, and if local residents wish to move jobs that is their decision and they will have done so to benefit themselves. This is a positive effect and a normal part of the employment economy. SZC Co recognises that the social care sector is concerned about workforce retention – while it is not the role of the planning system to address or regulate this, SZC Co has identified support for the sector to undertake workforce planning and resilience through the Public services Resilience Fund. SZC Co. consulted on options for the location of the sports facilities, and decided based on feedback that providing a permanent facility that the community could access and would be retained beyond the construction phase of Sizewell C is on balance a more positive approach than having the facilities at the campus. SZC Co. has worked closely with ESC and Alde Valley Academy on the sports facilities proposal and would not have sited the pitches in that location were the school not supportive. SZC Co.'s intention is to open these facilities with shared use at the same time as the accommodation campus, at the end of the third year of construction, when shared use would commence. During the school day, the facilities will be for the exclusive use of the school. The Worker Code of Conduct helps manage worker behaviour by setting expected standards both on and off the site. Signature of the code would be a condition of employment on the Sizewell C Project and it would be reinforced by ongoing communication, such as toolbox talks. Breach could lead to dismissal from the Project. The Worker Code of Conduct has been effective at Hinkley Point C – as evidenced by the

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		Councils' Local Impact Report (paragraph 28.13 of the LIR) in reference to the Oxford Brookes Study of Hinkley Point C (Appendix 2.1 to the LIR), which states (page 59): "*for community safety, there appears to be good management of potential project impacts through a combination of mitigation measures, including the implementation of the Worker's Code of Conduct, and some resourcing has been provided towards community liaison and policing.*"
	Response by Suffolk Constabulary at Deadline 3	Suffolk Constabulary agrees with Suffolk County Council (SCC) that there are gaps in the Applicant's published assessment of impacts resulting from the influx of the NHB construction workforce. With reference to the fourth bullet point under 5.12.3, whilst the Applicant has presented a quantitative assessment of population dynamic effects this has not been factored into their assessment of resulting community safety impacts and consequently the identification of required mitigation (i.e. resulting from higher risk demographic profile and concentration of NBH construction workforce in a rural community). As highlighted within Suffolk Constabulary's Written Representation (REP2-168), the influx of a predominantly male workforce into a County recognised as being 'rural' by the Home Office and in an area (Leiston) recognised as facing deprivation will have profound consequences for the management of community safety issues and associated policing requirements. The impact assessment also fails to properly recognise that the primary receptor is the impacted population (including SZC workforce and associated families) itself, rather than public and emergency services who will need to perform a key mitigation role to prevent, minimise and address community safety impacts when incidents (i.e. impacts on or affecting the population as the primary receptor) occur. Public and emergency services including Suffolk Constabulary therefore need to have sufficient resourcing and associated funding to address the substantial net additional community safety impacts of the SZC project without causing an unacceptable deterioration of existing service levels to Suffolk's communities. Please refer to Part 3 of Suffolk Constabulary's Written Representation (REP2-168) for further comments regarding identified deficiencies within the Applicant's published impact assessment.

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 5	As set out in SZC Co's **Deadline 3 Submission 9.28 - Comments on Written Representations to Written Representations** [REP3-042], **Chapter 16**, SZC Co recognises that the assessment in **Volume 2, Chapter 9** of the **ES** [APP-195] (**paragraph 9.7.218**) applies Suffolk-wide rates of crime per head of population to the workforce. It notes that these are higher than the rates of crime identified per 1,000 workers at Hinkley Point C, as reported by Avon and Somerset Constabulary to the Socio-economic Advisory Group, which is based on the demographic and economic characteristics of the workforce, and the mitigation applied to them (such as the Worker Code of Conduct) – all factors which will be the same at Sizewell C. The assessment is therefore based on higher crime rates than those which take account of the demographics of the NHB workforce. As set out at Section (b) of SZC Co's **Deadline 3 Submission 9.28 - Comments on Written Representations** [REP3-042], **Chapter 16**, SZC Co has significant concerns about the very limited demographic adjustment that Suffolk Constabulary applies (age and gender only) in its model. The assessment at **Volume 2, Chapter 9** of the **ES** [APP-195] uses baseline crime rates for the Leiston Neighbourhood Area to assess the significance of effects, and therefore does consider the sensitivity of Leiston and the rural community in its conclusions. The assessment at **Volume 2, Chapter 9** of the **ES** [APP-195] is an assessment of the significance of effects of the NHB workforce on rates of crime and anti-social behaviour in the population, upon which principle the development of mitigation (i.e. police resourcing) would be based. With regard to Part 3 of Suffolk Constabulary's Written Representation (which refers to methodological concerns raised by Suffolk Constabulary relating to significance criteria, valency of population change, crime/non-crime incidents, assumption that proposed mitigation will be effective, level of pre-application engagement, and other issues related to the assessment scope) – SZC Co considers that these matters have been appropriately responded to through SZC Co's **Deadline 3 Submission 9.28 - Comments on Written Representations to Written Representations** [REP3-042] but would wish to make clear the following points:

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		As set out at **para 9.7.158** of **Volume 2**, **Chapter 9** of the **ES** [APP-195]: *It is not possible to identify the extent to which a population impact is beneficial or adverse, without considering the specific impacts which that net additional population might have on public services and community cohesion, integration and sustainability.* A population change in and of itself does not have a valency – it has a magnitude and a sensitivity – but as it is not in itself an 'effect' it can neither be seen as adverse or beneficial. The effect of that population on receptors is where valency is required. The metric used to identify significant effects, in this instance, has been crime. If non-crime incident data were available, this could have been a contributory factor or additional contextual factor in determining significance. The assumption is that there is likely to be some proportional relationship between crimes and non-crime incidents – this means that the consideration of non-crime incidents is relevant to the development of mitigation – which SZC Co acknowledges – but wouldn't change the approach to significance rating. Both SZC Co and Suffolk Constabulary recognise the significance of effects, and are working to fully understand how to mitigate it to a less than significant level. At **paragraph 9.7.229** of **Volume 2, Chapter 9** of the **ES** [APP-195] SZC Co states that (emphasis added) "*SZC Co. recognises through engagement with Suffolk Constabulary, that recorded crimes (the metric used in this assessment) are only one contributor towards police resourcing, and that information on response to non-reported incidents and dealing with crimes not categorised by the Home Office definitions can lead to greater demand for police resourcing".* SZC Co and Suffolk Constabulary have now shared data on non-crime incidents (as per Suffolk Constabulary's Written Representation [REP2-168], and SZC Co's **ES Addendum** [AS-181]). Including an additional type of metric (such as non-crime incidents) would not lead to a difference in significance of effects – it would just result in a different approach to defining mitigation. It is common practice to predict the effectiveness of mitigation in determining residual significance and all of the chapters of the Environmental Statement do this. With respect to socio-economic mitigation, SZC Co has clear evidence that proposed measures are effective – this has been demonstrated at Hinkley Point C and is acknowledged by monitoring at Hinkley Point C (which draws on Avon and Somerset Constabulary data (2018); SEAG Dashboard - Community Safety; and a 'fear of crime'

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		survey) which states that "*Overall, the Worker Code of Conduct appears to be working effectively".* In terms of other mitigation (such as vetting, project accommodation, sports facilities etc) – the hypothetical counterfactual is that if this is not working at Hinkley Point C, and crime rates are still lower for workers than average for residents, and there is no background trend for crime increase (as set out in **Plate 16.3** of SZC Co's **Deadline 3 Submission 9.28 - Comments on Written Representations to Written Representations** [REP3-042]), **Chapter 16**, this would mean that the mitigation is not even needed. SZC Co consider that the measures in the Community Safety Management Plan go beyond the minimum for incident response – they set out the activities that the project will put into place to reduce the likelihood of crime occurring, rather than contributing to the resources required to respond to crime should it occur As set out at **paragraph 9.4.18** of **Volume 2**, **Chapter 9** of the **ES** [APP-195] "*A full description of detailed inputs to the determination of the 60-minute travel area and CDCZ is included in Appendix 9A of this volume, with specific elements covered in Appendix 9C and Appendix 9D of this volume, as well as in the Transport Assessment (Doc Ref 8.5)*". This confirms that the 60-minute area is broadly determined by the extent to which workers would receive subsistence allowance under the Working Rule Agreement, enabling/incentivising them to be NHB workers. The 90-minute area isn't a hard limit – and includes other sub-areas by skillset – which are based on Census travel-to-work data, and Construction Industry Training Board research on labour mobility in the construction sector.
SE.1.1	The Applicant	**Accommodation Strategy** As there appears to be the potential for both Sizewell B and the Proposed Development to be operating simultaneously: (i) are you able to explain how the outages at the respective plants would operate, and whether they would be co-ordinated or operate independently? (ii) Please explain the basis for the ES assessment in this regard and the different implications of the different scenarios. (iii) In the event that they might be co-ordinated- how would this be achieved?

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	Response by SZC Co. at Deadline 2	Response to (i) and (iii) Both Sizewell B and Sizewell C are pressurised water reactors which can only refuel when the plant is shutdown – this shutdown period is termed a refuelling outage. A refuelling outage occurs once every 18 months per reactor and lasts up to 2 months and involves taking apart the reactor components to replace depleted fuel. During a refuelling outage, components that cannot be accessed during its power cycle are inspected or replaced and tested, in addition statutory testing and routine maintenance is carried out. During this period over 10,000 separate activities are carried out at respective plants. These activities are planned two years in advance and involve contracts being awarded to numerous firms to assist and work in unison with the permanent staff. When the refuelling, maintenance and statutory work is complete, the plant is reassembled and tested to ensure it meets its safety, functional and operational requirements and then returned to service. The Office for Nuclear Regulation reviews the performance of outages and when satisfied with the performance and condition of the station, including the activities of the relevant independent insurance inspectors and Sizewell B's / C's internal Independent Nuclear Safety Assessors, will issue a licence instrument to allow the reactor to be re-started for a further 18 months' generation. The issue of the licence instrument concludes the Refuelling Outage and the plant returns back to full power generation. On occasion, component parts of the plant break down resulting in additional 24-hour maintenance activities. These so-called 'mini outages' or 'forced outages' are, where possible, planned for before they occur, reducing downtime and out of hours working. Work associated with mini outages and forced outages is normally limited to a small number of specialist staff and the relevant issue tends to be resolved in a relatively short period of time. Longer unplanned outages are rare but are sometimes necessary to ensure the safety of the public and workforce, and to ensure that the relevant repairs are of a permanent nature and meet or exceed all international standards for nuclear power generation. The outages at Sizewell B and Sizewell C would operate independently but co-ordination between the two power stations would be sought between the two power stations to try to stagger refuelling outages if possible. During the construction phase, some Sizewell C workers may move temporarily to Sizewell B during an outage, particularly those who have specialist skills. This could lead

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		to a dip in accommodation demand from Sizewell C. In addition, Sizewell C would offer any spare campus or caravan site accommodation to Sizewell B outage workers (the latter will have a similar level of vetting to Sizewell C workers so there would be no security concerns in this respect). During the operational phase, Sizewell C refuelling outages will aim not to be concurrent with Sizewell B refuelling outages, for example through careful output management to enable the operating cycle to be planned to avoid a clash. It is normal working practice within the existing nuclear fleet to try to stagger outages so that key skilled teams are available for sites and not "double booked". However, SZC Co. cannot guarantee that Sizewell B and Sizewell C outages will not occur simultaneously, and this may occur due to either forced outages or delays during outages causing overlap. Currently Sizewell B is the only pressurised water reactor in the UK. However, this will increase to five with the addition of Hinkley Point C (2) and Sizewell C (2). It is expected that more outage expertise will be developed nationally, with outage workers potentially residing within commuting distance of the Sizewell nuclear power station complex due to the 3 reactors there. Suffolk therefore has a substantial opportunity to benefit from leading the UK's national skills and employment base in nuclear maintenance and safety. <u>Response to (ii)</u> Please see the response to question **CI.1.5** in **Part 3**.
	Response by Suffolk Constabulary at Deadline 3	If accommodation within the immediate vicinity of Sizewell B (SZB) and SZC, which is traditionally available for SZB outages, is used by the SZC NHB workforce, outage workers would need to seek accommodation within a wider area. This increases the area over which community safety issues are likely to arise from SZB and SZC in combination, including the risk of road traffic incidents, and increases corresponding mitigation requirements. Adopting a conservative approach, the base level police resource modelling prepared by Suffolk Constabulary (as detailed within Part 2 of the Constabulary's Written Representation (REP2-168)) has not accounted for potential additional in-combination effects related to SZB outages. Through recent discussions with the Applicant and Avon & Somerset Police (regarding the management of community safety at HPC) it is now clear that the proposed 'security vetting' relates only to ensuring compliance with nuclear site licencing and the suitability of personnel to undertake specific roles on the SZC site, rather than considering the

ExQ1	Question to:	Question:
		potential for adverse community safety impacts from the workforce population, including crime risks, on offsite communities. Whilst the proposed security vetting is a welcome step, it needs to be understood that the level of vetting proposed may not itself preclude prospective workers with previous criminal convictions or otherwise posing potential community safety risks from becoming employed at SZC. From discussions with the Applicant the Constabulary understands there is no intention to change the vetting process or level used at HPC in relation to SZC, indeed it is not possible for the Applicant to enforce a higher standard of security vetting, e.g. one which could ensure those with previous criminal convictions are not employed, as vetting requirements must be proportionate to the security and safety needs of individual roles. This limits the effectiveness of the Applicant's proposed vetting to materially act as a community safety mitigation measure.
	Response by SZC Co. at Deadline 5	**With regard to outages at Sizewell B:** Sizewell B has been having outages every 18 months for decades without observed issues related to community safety. This is an established part of the baseline and would already exist within the Constabulary's resourcing model. Sizewell B Outages are at fixed points in time – every 18 months, with the next one due in Autumn 2022 so it is difficult to align the schedule precisely with the Sizewell C construction programme which has an uncertain start date. The Sizewell C assessment is based on the construction peak occurring during the summer peak tourist season whereas outages are deliberately timed to avoid the summer peak – partly because the main demand for accommodation from outage workers is in the tourist sector. As set out in the response to question **SE.1.1** (**Responses to ExA's First Written Questions**) [REP2-100] **(in Part 6, Chapter 23),** during the construction phase, some Sizewell C workers may move temporarily to Sizewell B during an outage, particularly those who have specialist skills. **With regard to security vetting:** SZC Co. will adopt the same enhanced Personnel Security Regime as Hinkley Point C, in which proportionate and effective personnel security arrangements adequately balance

ExQ1	Question to:	Question:
		security arrangements, with the requirements for an efficient construction site and associated sites and offices. It will comprise a suite of proportionate pre-employment and post-employment (Aftercare) controls, which seek to mitigate the insider threat, assure workforce trustworthiness and provide assurance to the project on pre-employment checks. All workers who require regular unescorted access to Sizewell C will be subject to industry pre-employment checks. This meets Nuclear Site Licence (NSL) requirements set out by the Office for Nuclear Regulation (ONR) and also helps mitigate potential community safety risks. Pre-employment checks are used to select the best person for the job and negative factors that could influence this decision include, for example theft, assault, drug misuse and fraud. If during the application and pre/post-employment process, there are issues in respect of the individual's honesty, integrity and values, the Sizewell C Project may choose not to process an application and/or decline site access. In addition, caveats may be imposed on access. These may be by ONR(CNS) and the Central Vetting Service (CVS) under current signing guidelines, as well as developed by SZC Co. for use on the Sizewell C Project. Examples of the latter might include no commencement of work without prior assessment by OH; additional line management supervision/reports; no lone working; enhanced drug and alcohol testing regime; additional criminal record checks; financial checks/interviews.
SE.1.3	The Applicant	**Accommodation Strategy** In light of the concerns highlighted by Westleton Parish Council [RR-1264] please explain how the socio economic assessment has assessed the potential effects on the supply and provision of local trades people.
	Response by SZC Co. at Deadline 2	SZC Co. notes that Westleton Parish Council [RR-1264] is concerned that '*EDF expects to import most of the supply chain and workforce from Hinkley Point whilst most of the 'local' people to be employed are expected to fill the lower-skilled/paid jobs in "Site Support" and consider that the scale of the development would "disrupt the local economy'* but no specific reference is made in that representation to effects on the supply and provision of local trades people.

ExQ1	Question to:	Question:
		Some local employees in relevant skilled trades are likely to gain work on the Sizewell C Project, however SZC Co. has considered the labour market for relevant skills, not repairs and maintenance, with key areas of demand being for civil construction positions, as set out in **Volume 2, Appendix 9A** (Technical Note 1 – Workforce Profile) of the **ES** [APP-196]. The construction industry is peripatetic, and it is the decision of any person whether to accept contract work for any employer or client. The nature of labour markets is that in cases where economic activity is in demand, that demand is often filled by existing firms expanding to undertake work, or new firms arriving in the area to fill the gap in supply, and this is likely to be the case here. Nonetheless, SZC Co. is cognisant that there is concern related to the availability of skilled labour, whereby it is suggested that some local firms may experience vacancies being harder to fill. This is not displacement, and is a normal function of a positive economic intervention to which labour markets respond, and as such is not considered a significant adverse effect. SZC Co. has designed a range of measures, to be secured through the **Draft Deed of Obligation** (latest draft Doc Ref. 8.17(C)), to reduce the risk of increased labour market churn leading to adverse effects, and to boost the supply of relevant skills in the labour market. Principles for these measures are set out in the **Economic Statement** [APP-610] and the appended **Employment, Skills and Education Strategy** [APP-611], and further details of the scope, implementation, governance and monitoring related to the specific initiatives is set out in the **Draft Deed of Obligation** (Doc Ref. 8.17(C)).
	Response by Stop Sizewell C at Deadline 3	Displacement effects on local businesses – competition for a construction workforce The Applicant has responded to a concern by Westleton Parish Council regarding potential effects on the supply and provision of local trades people. The Applicant has responded by stating that any effect caused by SZC leading to local businesses finding vacancies harder to fill "…is not displacement, and is a normal function of a positive intervention to which labour markets respond, and as such is not considered a significant adverse effect". Stop Sizewell C disagrees that such an effect should not be regarded as displacement. Our reasons are set out in a detailed response to SE.1.37 later in this response document. However, it is also clear from their response to SE.1.32 (see below) that SZC Co. is planning for significant levels of workforce recruitment during construction from other

ExQ1	Question to:	Question:
		local employers. In particular, in responding to SE.1.32 they cite as an influence on their workforce planning strategy the experience of building of Sizewell B, where they state that 30% (600) of the peak recruitment year workforce had been recruited from other local employers, whilst only 20% of this workforce had been previously unemployed or inactive. This in turns suggests the remaining 50% of the workforce were working on the Sizewell B site with their current employers (presumably as sub-contractors). The implication of all of this is that 80% of the locally recruited workforce in the peak year for Sizewell B were displaced from other activities, either: • directly recruited from other employers (30%); or • undertaking work for their employers on site (instead of working on other projects for their employer). Therefore, if the experience of Sizewell B is repeated then circa 80% of the gross local construction phase effect will actually amount to local employment business activity being actively displaced from elsewhere (i.e., when the conventional definition of displacement is applied, rather than the Applicant's unique interpretation).
	Response by SZC Co. at Deadline 5	Please see SZC Co's Response at Deadline 5 to SE.1.5, SE.1.15, SE.1.37 and G.1.24.
SE.1.5	The Applicant, relevant local authorities	**Economic Benefits** The Economic Statement suggests [APP-610] there would be substantial economic benefits arising from the development. Please explain whether the experiences that arose from the development of the current and former nuclear power stations resulted in positive benefits. A number of RRs indicate that there has not been a long term benefit to the local area (RR-002, RR-008) how do you anticipate that this scheme could ensure a positive legacy in economic terms for the local area?
	Response by SZC Co. at Deadline 2	Sizewell B began construction in 1988 and started generating electricity in 1995. It provides 770 permanent jobs in the region, many of which are in high-skilled, high-output energy generation sectors, but others include administrative and entry-level jobs[1].

[1] EDF Energy (2021) Sizewell B power station and visitor centre. Available at: https://www.edfenergy.com/energy/power-stations/sizewell-b#:~:text=Sizewell%20B%20is%20a%20nuclear%20power%20station%20on,It%20is%20the%20UK%E2%80%99s%20only%20Pressurised%20Water%20Reactor.

ExQ1	Question to:	Question:
		Without the current and former nuclear power stations at Sizewell, these jobs would not exist. Analysis of the 2011 Census shows that of the jobs supported in Sizewell's Workplace Zone (a statistical spatial definition including Sizewell campus and surrounding areas, but not including Leiston or other urban areas), 77% are taken by residents of Suffolk and nearly 300 by residents of Leiston, suggesting strong local retention of economic benefits during the operational phase of Sizewell B. While parts of Leiston remain within the most deprived areas of England and Wales, there is no evidence to suggest that a counterfactual position without the intervention of Sizewell B or Sizewell C would result in better or worse economic conditions locally or across the region. In the case of wider areas, any effect would be impossible to disentangle from the wider economy. A review of public datasets suggests that: • Claimant rates in East Suffolk have been consistently lower than the national average, with even lower rates in Leiston since the construction of Sizewell B. • East Suffolk has an occupational skill profile weighted more towards higher skilled occupations than the national average and has done in the past two Censuses (2001 and 2011), and a higher proportion of residents with higher level qualifications. A review of the socio-economic effects of construction of Sizewell B by Glasson and Chadwick[2] summarises that: • Some policy measures were undertaken by Nuclear Electric and contractors at Sizewell B including recruitment of school-leavers to apprenticeships, setting up an on-site Jobs Centre and sponsorship of unemployed adults to undertake short training courses. • Unemployment rates in the local economy during the early 90's recession were far lower than wider averages as a result of Sizewell B, and have not increased above average for the majority of the period since. Only a small minority of people leaving the Sizewell B project at the end of construction were surveyed to have experienced lengthy periods of unemployment.

[2] Glasson, J and Chadwick, A. The local socio-economic impacts of the Sizewell B PWR power station construction project 1987–1995: Summary report. Impacts Assessment Unit: Oxford Brookes University. 1995

ExQ1	Question to:	Question:
		• The Central Electricity Generating Board made grants available to local community projects, having spent £575,000 on 38 individual projects during the construction phase, over half of which were in Leiston. • Nuclear Electric provided £1.86m funding for the construction of Leiston Leisure Centre / swimming pool which opened in 1992. The Sizewell B public inquiry was held in the 1980s and - as set out above - the construction period ran from 1988-1995. It was almost 35 years ago that the design of the scheme and associated employment and economic benefits were appraised and tested. The permission did not include a comprehensive set of long-term commitments for sustainable economic, social and environmental change such as are proposed for the Sizewell C Project. There was limited focus on designing training and employment schemes, not least as the construction industry was structured very differently with respect to qualifications, competencies and the promotion of sustainable development. As the only pressurised water reactor to be built in the UK and the first (and only) new nuclear build of that era, the design of Sizewell B did not benefit from any learnings accrued from comparable projects; the Sizewell C Project has been designed with the benefit of learnings from a range of national precedents, notably Hinkley Point C. Sizewell B did not come forward as part of a co-ordinated and complementary plan for new nuclear development, nor did it benefit from NALEP support for the Energy Coast and a raft of energy infrastructure construction projects leading to agglomeration benefits and policy support for sustainable investment in skills and training. The **Draft Deed of Obligation** (Doc Ref. 8.17(C)) includes measures to provide resilience and long-term legacy to the areas likely to experience the most change as a result of the Sizewell C Project, such as Leiston. This includes a ring-fenced Community Fund, Housing Fund, Tourism Fund, physical investment in transport infrastructure and public rights of ways and cycleways and sports facilities in Leiston, as well as employment, skills and training investment set out above that will focus on areas, where it will provide the greatest social value. The Sizewell C Project will result in 900 more permanent jobs for the region, many in high-skilled, high-output sectors. The **Economic Statement** [APP-610] sets out further detail on economic benefits for Sizewell C - see **Section 3.2** for headline benefits during the operational phase.

ExQ1	Question to:	Question:
	Response by East Suffolk Council at Deadline 2	As the development of Sizewell C is located in East Suffolk, ESC is ultimately responsible for, and interested in, every aspect of economic development. This creates considerable responsibility and workload, and will require very careful oversight, management, and control. Establishment of the economic development programme is therefore critical for this project in this location. The scheme can help to create a positive legacy in economic terms for the local area by ensuring that: • The Applicant open and maintain a local office presence in Leiston to support planning, construction and operation of Sizewell C. • Supply chain development is maximised to both enable local firms to become involved and to attract new entrants. • Local firms and new entrants receive the support they need to get established as supply chain participants, to find and develop land/premises needed, to successfully recruit the workforce they seek and that they receive support to help them engage locally, encourage/enable them to recruit locally, and to ensure they stay local. • Education and skills provision is available, accessible, and relevant to young people and to the local workforce to enable them to train for Sizewell C relevant roles and so creates a multi-generational shift in employment prospects. • Businesses associated with and involved in with Sizewell C are encouraged/enabled/required to recruit locally where possible, so a multi-generational shift in employment prospects results. • Leiston is cited as a base for activities and initiatives which create lasting benefit for its people, businesses and community. • Support is provided for 'bounce back' activity which backfills, supports gaps/risks/impacts created by Sizewell C development, such support to include local business support. • Plans are made to avoid both a 'false dawn' of economic hope and a 'boom and bust' scenario, both requiring careful management of expectations amongst local communities. • Support is given to New Anglia LEP, SCC, and ESC who are keen to see an economic development programme that delivers opportunity now and throughout the lifetime of the Sizewell C project and beyond via lasting legacy. This programme recognises that the Economic Capacity and the Economic Health of the Region are intrinsically linked and need

ExQ1	Question to:	Question:
		to be effectively coordinated. The interaction between the Economic Capacity and the Economic Health of the Region involves both Business Attraction and Business Support. • Support is provided to encourage and assist ESC, SCC, and New Anglia LEP to deliver their agreed Statement of Economic Intent which represents the agreed vision of partners working together with the Applicant. The highlighted areas of focus are: Business Support, Supply Chain, Inward Investment, Visitor Economy, Education, Skills and Employment, Community, Infrastructure and Environment. • Financial support is made available to ESC, SCC, and New Anglia LEP so they can manage Economic Development matters with single focus and careful coordination across all of the partners via a comprehensive Economic Development programme. This programme is required to avoid duplication, inefficiency and gaps and also to coordinate work to maximise opportunities and create legacy benefits. • The programme should include development of specialist functions to create focus on key issues and provision of specialist support services to ensure that businesses receive the help they need. • Expert functions should be created across each of New Anglia LEP, SCC, and ESC. These functions should be focussed on inward investment (1), business support (2) and economic development programme management (1). • Specialist services should be focussed on investor attraction and development (New Anglia LEP), and business support (New Anglia LEP and ESC).
	Response by Suffolk County Council at Deadline 2	Experience from the build of Sizewell B, as considered in the longitudinal research study led by John Glasson of Oxford Brookes University (summarised in an article in "Impact Assessment and Project Appraisal", vol 23, September 2005, pages 215–226 [See SCC Appendix to ExQ SE.1.5]), identified a number of economic benefits arising from the build. These included (page 219/2020), • Training initiatives On-site and at the Leiston Training Centre were significant in encouraging a high take-up of local labour; almost 1000 trainees passed through the Centre, and approximately one third were from the local unemployed • Additional workforce expenditure in Norfolk and Suffolk topped over £75 million during the project (at early 1990's prices), generating important additional business for a range of services, including pubs, restaurants, shops, garages and providers of accommodation.

ExQ1	Question to:	Question:
		• A substantial boost to local employment (especially in the civil engineering phase of construction) • A wide ranging boost to the local economy, reflected in very low unemployment rates and indirect impacts on retail activity and provision However, approximately 60% of local recruitment was into semi-skilled/unskilled and clerical jobs; 30% had skilled jobs and 10% had taken up professional, technical and managerial positions. The lack of a long-term impact on the local economy is demonstrated by the continuing income deprivation in the local area caused by worklessness and a lack of employment opportunity (see also LIR [REP1-045] at 23.22) The SZC project can help to create a positive legacy in economic terms for the local area. Specifically, within Chapter 24 of the LIR we have acknowledged that benefits will include, • a boost to the local economy as a result of the construction phase, equating to £2.5bn of output and supporting over 40,000 person years of construction employment; • Local employment creation – a third of jobs at peak of construction expected to be filled by existing local residents, including people previously unemployed or inactive; • Spending in the area from non-homebased workers, and as a result of extra wages for home-based workers; • Supply chain opportunities. These expected benefits are welcome, but they can only be seen as opportunities rather than confirmed benefits, and SCC expects that economic opportunities for the local area are maximised, and the Applicant's ambitions in this area further increased. Alongside mitigating negative impacts we expect the applicant to maximise positive economic benefit by, • Supporting recognition for Suffolk's Energy Cluster with its existing offshore and onshore renewables opportunity, with the Applicant being a lynchpin actor in the activity of the region, accelerating inward investment of Tier 1 and Tier 2 suppliers who may be working in multiple energy construction projects locally. • Creating opportunities for growth in existing and newly accredited nuclear related businesses associated with delivering the Civils and ME & H for the build

ExQ1	Question to:	Question:
		• Generating opportunities for growth in non-nuclear related businesses associated with supporting the delivery of the project, for example, local catering, leisure and retail companies. This provides benefits to the wider economy and population as well as the nuclear supply chain. • Supporting the creation of new consortia (Food, Transport, Engineering, etc.) with businesses being created from grass roots partnerships and pitching for entry to the supply chain and with the right support. • Stimulating wider financial investment - there is expected to be an increasing demand for land and premises ranging from small yards for lower-level contractors to more formal office spaces. • Developing R&D/Innovation opportunities such as that already being manifested in the work on hydrogen and the linkages to Freeport East. • Creating legacy across all identified growth. A significant opportunity is companies new to the nuclear and energy supply chain providing them with opportunities for future growth in the UK new nuclear market as well as the wider global nuclear supply chain. • Supporting the outcomes set out in the Nuclear Sector Deal the government's Energy White Paper, the Ten Point Plan for a Green Industrial Revolution and Build Back Better in delivering clean growth and achieving a net zero economy. There will be direct and indirect business and supply chain opportunities as a result of the operational Sizewell C power station, which in itself would create 900 high value local jobs. In addition, the rolling programme of outages for Sizewell B and Sizewell C reactors, drawing in a workforce of 1,000+ to service each reactor, would create further direct and indirect business and supply chain opportunities.
	Response by SZC Co. at Deadline 3	SZC Co. agrees with SCC that there was a positive benefit in the construction phase of Sizewell B in terms of employment and supply chain activity. Deprivation in Leiston is not evidentially related to Sizewell B, and the counterfactual by definition cannot be estimated. Sizewell B contributes over 700 jobs to the local area, and provided legacy benefits through investment in community programmes and social infrastructure investment.

ExQ1	Question to:	Question:
		SZC Co has reviewed the proposals identified by ESC set out in response to this question, and in **Annex D** [REP1-049] to the Local Impact Report "Sizewell Economic Principles". It reflects a largely sensible and pro-active position for the Councils' economic development function and identifies the substantial opportunities for the region to benefit from the Sizewell C Project. In some cases, it provides good examples of the outcomes that can be achieved through effective use of measures to be secured under **Schedule 7** of the **draft Deed of Obligation** (Doc Ref.8.17(D)). SZC Co notes that the **Norfolk and Suffolk Economic Strategy** outlines an aim "*to maximise the opportunities associated with the proposed Sizewell C nuclear power station in terms of supply chains, employment and skills opportunities and inward investment*". This suggests that the Councils have a policy direction to undertake activities themselves to maximise the Project's opportunities. SZC Co wishes to note that it plans to work collaboratively with the Councils and other economic development partners to help the Councils achieve their economic objectives, and where interventions are likely to be the decision of contractors (such as the use of office facilities in Leiston or elsewhere) SZC Co will facilitate these engagements. SZC Co. agrees with SCC in terms of the opportunities that would be delivered by Sizewell C, and has set out in response to **SE.1.5** [REP2-100] how the opportunities would be enhanced for local residents through measures set out in the **draft DCO** [REP2-015] (in terms of embedded mitigation) and the **Draft Deed of Obligation** (Doc Ref. 8.17(D)). Please also refer to SZC Co.'s response within **Comments on Councils' Local Impact Report** (Chapters 23, 24 and 25) (Doc Ref. 9.29).
	Response by Suffolk Constabulary at Deadline 3	It is essential the Deed of Obligation document (S106) includes robust provisions to ensure adequate and effective mitigation and monitoring, including in relation to changes in workforce levels and community safety impacts (from those currently predicted) as well as in relation to the adequacy and effectiveness of deployed mitigation. Following discussions between Suffolk Constabulary and the Applicant, Part 2 of the Constabulary's Written Representation (REP2-168) focused on quantifying demand arising from likely community safety impacts attributable to the projected SZC NHB workforce population (including families) on a per capita basis and owing to the need for significant AIL movements. However, additional resource implications also need to be considered in the context of wider community safety and policing impacts not directly attributable to

ExQ1	Question to:	Question:
		individual construction workers or AIL movements. Robust monitoring and adequate contingency arrangements therefore need to be in place through the Public Services Resilience Fund and the Community Safety Working Group to ensure Suffolk Constabulary has sufficient capacity to timeously address additional community safety risks should they materialise. From a governance perspective it is important Suffolk Constabulary is appropriately recognised as one of Suffolk's key community stakeholders with a far a reaching understanding of the community, including unique intelligence regarding socio-economic and transport issues. It is therefore imperative for the Constabulary to be adequately represented on all appropriate decision-making groups where monitoring and mitigation (including funding) to address community safety and transport impacts are addressed throughout the construction period.
	Response by Stop Sizewell C at Deadline 3	Changing Structure of the Construction sector since Sizewell B reinforces concerns about workforce displacement effects In responding to SE.1.5 the Applicant states that in comparison to when Sizewell B was built (1988-1995), the Construction industry is now "structured very differently with respect to qualifications and competencies". We agree entirely with this comment. Indeed, the evidence for the increasing skills requirement of the Construction sector is evidenced in trend data from the ONS Labour Force Survey. However, this fact suggests in turn that the Applicant's need to recruit a skilled and experienced workforce is likely to have an even greater impact on existing local businesses operating in this sector, thereby further reinforcing the point made in respect of SE.1.3 above.
	Response by SZC Co. at Deadline 5	**In response to Suffolk Constabulary's Response at Deadline 3:** It is not clear why '*additional resource implications also need to be considered in the context of wider community safety and policing impacts not directly attributable to individual construction workers or AIL movements*' – these effects would only require mitigation by the Sizewell C Project if they could be reasonably attributed to it. SZC Co respects and recognises the Constabulary's position with regard to being one of Suffolk's key community stakeholders across community safety and transport issues, and has identified the Constabulary as a key member of the Project's governance body for community safety issues – the Community Safety Working Group – which will oversee the

ExQ1	Question to:	Question:
		distribution of the Public Services Resilience Fund and any monitoring related to workforce, community and transport that are relevant to community safety. This is secured by the **Draft Deed of Obligation** (Doc Ref. 8.17(E)). **In response to Stop Sizewell C's Response at Deadline 3:** SZC Co's assessments in terms of demand for skilled labour are based on the understanding of the skills required for the Project and the skills available in the labour market. SZC Co has developed a wide range of initiatives for the development of local and regional skillsets to ensure that it can recruit at least the estimated number of HB workers, and promote sustainable long-term careers for people through the Project, at **Schedule 7** in the **Draft Deed of Obligation** (Doc Ref. 8.17(E)). Based on experience at Hinkley Point C – where the proportion of HB recruitment has been significantly higher than the conservative estimate for Sizewell C, and there is no evidence of displacement – and that Suffolk County Council and East Suffolk Council are in broad agreement on the principles of skills, employment and education initiatives set out by Sizewell C, SZC Co is confident that displacement will not occur. Where it may be that some vacancies could be harder to fill, measures such as the Jobs Service will support local businesses in backfilling, and supply chain engagement measures will support local businesses with local employees to win work on the Project.
SE.1.7	The Applicant	**Effect on Local Business** Several RRS make reference to adverse effects on their businesses. [RR-0131] - effect on family business due to effect on tourism [RR-0126] – lack of detail on tourism fund [RR-0123] - impact on retail sales reliant on tourism/visitors [RR-0050] - adverse effect on caravanning and camping due to development [RR-1023] – adverse effect on livery businesses in the local area Please respond to these concerns and set out how if justified mitigation would be provided for each of these businesses.
	Response by SZC Co. at Deadline 2	The Interested Parties referenced in this question identify wider effects resulting in perceived changes to their business operation – namely that the Sizewell C Project would

ExQ1	Question to:	Question:
		result in fewer visitors to the area and reduced spend – and more site-specific effects on business operations related to land. Wider Tourism Economy Effects SZC Co. recognises the importance of the inbound tourist economy within and around the Suffolk coast, and has undertaken an assessment of the effects of the Sizewell C Project on tourism at the regional economy scale, in-line with the requirements of National Policy Statement EN-1, as part of **Volume 2, Chapter 9** (Socio-economics) of the **ES** [APP-195], which includes reference to experience at Hinkley Point C and Sizewell B, the inherent flexibility of the tourist sector, and limitations on the use of ex-ante perception surveys to predict changes in behaviour accurately. This sets out that there is limited empirical evidence that the Sizewell C Project would lead to a quantifiable reduction in visitor numbers, a change in visitor behaviour, expenditure or business viability in the sector over and above normal variation, particularly when a Tourism Fund is applied. It may be most appropriate to consider evidence of the difference between anticipated/perceived and actual effects, and the positive influence of a Tourism Fund, using Hinkley Point C as a case study. At Hinkley Point C, similar concerns of effects were raised by Interested Parties, but have not manifested into actual effects on tourism in Somerset – has provided evidence for the positive effect of a Tourism Fund used to promote and market the area and provide information to visitors and prospective visitors. Monitoring of business confidence through governance (via SEAG), as well as public datasets such as tourist-sector employment[3] and tourism spend[4], has shown no adverse effect on the Somerset tourist economy from the construction activity at Hinkley Point C where a Tourism Fund has been applied. A paper setting out further details on SZC's consideration of experiential evidence of the effectiveness of a Tourism Fund drawing on Hinkley Point C evidence is included as an **Appendix 23A** of this chapter (Response Paper – Tourism – Ex-ante Stated Preference Surveys and Hinkley Point C Evidence].

[3] ONS (2019) Business Register and Employment Survey. Accessed via NOMIS (https://www.nomisweb.co.uk/) on 21/5/21

[4] Visit Britain / Visit England (2018) Great Britain Tourism Survey. Available at https://www.visitbritain.org/

ExQ1	Question to:	Question:
		SZC Co. and stakeholders recognise the need for the Tourism Fund to ensure that stated intention based on perceptions of the project's effects does not materialise into actual changes in visitor behaviour. As such, the Tourism Fund should be used to promote, enhance and market the area. The Tourism Fund would be secured through the **Draft Deed of Obligation** (latest draft Doc Ref. 8.17(C)). The Sizewell C construction phase offers opportunities for local accommodation providers to increase business – if they are minded to – by accepting bookings from construction workers as well as or instead of tourists. This offers year-round occupancy potential. In these instances, businesses may also benefit from the tourist accommodation element of the Housing Fund, details of which are set out at **Draft Deed of Obligation, Schedule 3, Sections 1** and **2.7** (Doc Ref. 8.17(C)). For further information relating to this question please refer to responses to questions **SE.1.13, SE.1.36, SE.1.35** and **G.1.27**. Land / Effects on Individual Businesses SZC Co. recognises that the project may result in instances of localised effects on individual businesses where there is a loss of land or a permanent, irreversible change to the nature of business operations (subject to the statutory Compensation Code being applied). Effects on individual land holdings, including changes to activity, loss of land and severance are set out in **Volume 2, Chapter 17** (Soils and Agriculture) [APP-277] and **Volumes 3-9, Chapter 10** (Soils and Agriculture) of the **ES** [APP-371, APP-402, APP-435, APP-470, APP-502, APP-531 and APP-563]. These note that further consultation with landowners will be undertaken to reduce the impacts on the farm businesses, as far as practicable. This will include agreement of assurances and obligations that SZC Co. will accept upon entering the land, and compensation, where applicable. People who own and occupy property (including small business premises with an annual value below a set amount) that has been reduced in value by physical factors (e.g. noise and vibration) caused by the use of a new or altered road may be able to claim compensation under the terms of the Land Compensation Act 1973.
	Response by Stop Sizewell C at Deadline 3	SE.1.7 SE.1.13 and SE.1.14 Impacts on Accommodation and Displacement of Visitors In responding to the RSPB's concerns (SE.1.13) regarding effects on the visitor economy, the Applicant claims that 'there is limited empirical evidence that the Sizewell C project

ExQ1	Question to:	Question:
		would lead to a quantifiable reduction in visitor numbers, behaviour or expenditure'. They also state that there is little empirical evidence that business viability would be threatened as a result, particularly when support would be made available through a Tourism Fund. A similar response is made by the Applicant with respect to Snape Parish Council's concerns in SE.1.14. However, the response to SE.1.14 also reveals a tendency on the part of the Applicant to regard potential impacts on tourism as being confined to effects on the Tourist Accommodation sector. This tendency is also found in the response to SE.1.7, where the Applicant's response places stress on the opportunities for local accommodation providers to increase business "by accepting bookings from construction workers ***as well or instead of tourists***" (emphasis added). Obviously, it will be up to individual accommodation providers to decide if providing accommodation to construction workers instead of visitors is a better business opportunity for them (although the apparent suggestion that construction workers should be accommodated alongside holidaying families does raise some potential concerns). Setting that issue aside, what seems to be clear is that the Applicant appears to be mindful of potential effects on Accommodation providers, there does not appear to be any consideration of the potential effects on other businesses operating in the visitor and hospitality sector that are dependent on visitor spending. As was pointed out in our previous submission to the Inquiry at Deadline 2 (REP2-449l), research undertaken by the Destination Management Organisation identifies that only 9% of the earnings of the local tourism economy are generated by Accommodation providers, with over 90% of tourism expenditure generated by attractions, food & drink outlets, retailers, and other businesses). Stop Sizewell C is concerned that the potential effects of the project on local visitor attractions, food & beverage service businesses, and those parts of the retail sector that cater to the needs of visitors (e.g., local crafts, souvenir & gift shops, etc.) have never been properly assessed by the Applicant. The stance of the Applicant regarding negative effects on local tourism is that any potential harm could be mitigated by additional promotion and marketing via the Tourism Fund. But even if a significant portion of Accommodation sector is diverted to providing bedspaces for the SZC Construction workforce, then this ultimately would generate little net effect if there is a shortage of suitable accommodation for visitors to stay in. And if this is the case, the knock-on effects on the local economy could be substantial,

ExQ1	Question to:	Question:
		particularly for non-accommodation businesses that rely on staying visitors as an important source of revenues.
	Response by SZC Co. at Deadline 5	SZC Co has set out its position on the relative spending levels of construction workers and tourists within SZC Co's **Comments on Councils' Local Impact Report** [REP3-044] at **Chapter 26, Section 26.3, Part (b)**.
SE.1.12	The Applicant	**Two Village Bypass** (TVB) [RR 812] Indicates the TVB would adversely affect the holiday business, water supply and drainage at Mollett's Partnership. Please respond to these concerns and explain how the scheme would avoid or mitigate for adverse effects.
	Response by SZC Co. at Deadline 2	Holiday business The buildings within Mollett's Farm are located approximately 150m from the site boundary. It was assessed within the noise and vibration assessment (as a residential receptor) and moderate adverse (significant) effects were identified (with the accepted changes) during the typical and busiest days in 2028. At night in 2028 and in the long-term in 2034 (daytime and night-time), the changes in noise level were identified as minor adverse or negligible, which are not significant effects. The noise effects are set out in **Volume 5, Chapter 4** of the **ES** [APP-415] and updated in **Volume 1, Chapter 5** of the **ES Addendum** [AS-184] and its associated appendices in **Volume 3, Appendices 5.3.A** to **5.3.C** of the **ES Addendum** [AS-245]. Further mitigation will be considered as part of the detail design of the road, including, for example, quiet road surfaces. The landscape and visual assessment concluded that small scale effects would arise in on the landscape character in the fields around the farm (not significant) during construction. Mollett's Partnership is located between groups 1 and 2 within the visual assessment and is likely to experience significant impacts during construction, but would be not significant during operation. These effects are set out in **Volume 5, Chapter 6** of the **ES** [APP-421]. The General Landscape Strategy for the landscape proposals for the proposed development has been designed to minimise potential effects on ecological, heritage and landscape and visual receptors through provision of appropriate planting and will follow the design principles set out in the **Associated Development Design Principles** document (Doc Ref. 8.3(A)). In addition, planting would seek to mitigate the potential

ExQ1	Question to:	Question:
		impacts of the proposed development as set out in **Volume 5, Chapter 2** of the **ES** [APP-411]. No significant effects on air quality are predicted. SZC Co. has met with Mollett's Partnership a number of times to discuss their concerns and potential opportunities associated with workers looking for good quality year-round accommodation in the area. While SZC Co. is unable to advise on the choices for businesses to make on their business going forward. Mollett's Partnership may wish to consider accommodating Sizewell C workers, as they are well placed for access to the main development site or for workers constructing the associated development sites, including the two village bypass. As part of the Housing Fund, loans and grants for local accommodation providers are proposed, within the terms of the Tourist Accommodation Management Strategy, in order to increase capacity and resilience (see **Draft Deed of Obligation, Schedule 3, Sections 1** and **2.7** (Doc Ref. 8.17(C)). <u>Water supply and drainage</u> SZC Co. is currently working with Mollett's Partnership to understand the arrangements for water abstraction and how these coincide with the two village bypass. SZC Co. is committed to work with the relevant landowner and business to ensure that the route and presence of the 2VB will not impede their ongoing rights and ability to abstract water to the current scale and frequency. **Volume 5, Chapter 12** (Groundwater and Surface Water) of the **ES** [APP-441] includes for the assessment of the surface drainage network in the vicinity of the proposed two village bypass. The incorporation of sustainable drainage methods for the management of surface water, capacity for design storm conditions and an allowance for climate change, reached in agreement with Suffolk County Council, will enable locally produced flows from the highway to be managed locally and primarily by infiltration. The inclusion of culverts beneath the bypass will enable the continued flow of the existing drainage network. Overall, with these measures in place, the impacts are not judged to be significant.
	Response by Mollett's Farm at Deadline 3	We have a number of significant issues with the applicant's response, both in substance and accuracy, to the point that we consider it inadequate and misleading. 1.1. Proximity The applicant states that "*The buildings within Mollett's Farm are located approximately 150m from the site boundary"* as if this answers the ExA's question. It does not. EDF is

ExQ1	Question to:	Question:
		failing to recognise that our business is not just the buildings forming our self-catering accommodation offering or our farmhouse, but the entire farm environment. Guests currently relax in outdoor garden spaces, enjoy nature walks, pitch tents and attend events in parts of the farm that are considerably closer to the site 'red line' boundary – as close as 15m in fact – as clearly seen by the ExA during the recent Accompanied Site Inspection (ASI). The future enjoyment and use of these areas will be dramatically affected by TVB construction and operation. 1.2. Noise EDF's noise assessment is inaccurate and inadequate (as we have shown in our Deadline 2 Written Representation [REP2-380]) – making any impact conclusions drawn from it unsound. It is very frustrating to keep responding to the same claims made by the applicant even after we have taken the time, trouble and expense to prove them misleading. They keep repeating the same thing over and over. It does not make it true. 1.3. Visual Effects As to the visual effects, it is nonsense to suggest that the impact is not significant when it is obviously very significant. There is a huge difference between looking out over fields as opposed to looking out over a road under construction and then a busy road for at least 10 years during construction of Sizewell C (after all, that is why they say they need to build it). We are hoping that the ASI enabled the ExA to recognise how ridiculous EDF's assertions are. 1.4. Business Recognition We are grateful that EDF has now – belatedly – recognised that we do in fact have a business here. Until recently we were simply classed as "an isolated farmstead". 1.5. A12 Access The usability and safety of our existing A12 access to and from our business and home is likely to be severely compromised during construction of the TVB. However, there is still no response on this issue. For example, how should we and our guests get in and out safely, especially when towing a caravan or large agricultural equipment? 1.6. Amenity Access Our guests' ability to access to local amenities (the shops and the café restaurant at Friday Street are within walking distance) is a key selling point for an out-of-town

ExQ1	Question to:	Question:
		businesses such as ours. This will be completely severed. No acknowledgement of this has been made. Similarly, no provision has been made to mitigate or compensate for its loss. 1.7. Business Opportunities The assertion that they – SZC Co. – have met with us to discuss "potential opportunities associated with workers looking for good quality year-round accommodation in the area" is also misleading. Yes, they have visited us. However their standard phrases are that there are "no guarantees" and "we can promise nothing". Their ExQ1 response does not recognise the fact that should we accommodate their workers (via an open market 'preferred suppliers' list) this would actually be detrimental to our core business. Sizewell C workers' accommodation budget will be – by their own admission – significantly less than the tourist market that we service. We would experience higher costs with lower income. It would also be detrimental to the excellent business reputation we have built over the years (for example Booking.com 9.4, TripAdvisor 5*). Tourists and workers are not usually a good mix, especially when it involves shift work. Not to mention that we believe the disruption caused by the construction of the TVB is potentially going mean we have no tourists. Again, we refer you to our Deadline 2 Written Representation [REP2-380] – which has yet to be addressed by the applicant. It may well be that other tourist venues will benefit (especially out of season from extra workers) but during high season there is no "spare capacity" to speak of. It is not a 'like-for-like' comparison, as those other businesses will not be blighted and hamstrung by adjacent construction activity – like the TVB. Even if we were guaranteed full capacity at full rates, we would then have to rebuild our business from scratch after construction is completed – assuming that it is even possible, given that we also believe that the blight will continue well into the overall construction of Sizewell C. The response from EDF is simplistic, fails to recognise all the issues and is dismissive. It is grossly misrepresenting the concerns we have raised, by totally ignoring them. 1.8. Mitigation We need proper protection / mitigation involving bunding, noise attenuation fencing and screening. Not just a minor cutting that does not hide the traffic and a few plants that will take 15 years to become established and potentially exacerbate the noise generated by the TVB. 1.9. Water Supply and Drainage

ExQ1	Question to:	Question:
		At the time EDF wrote their response "SZC Co. is currently working with Mollett's Partnership to understand the arrangements for water abstraction and how these coincide with the two village bypass" we had yet to receive a single contact from them on this subject. At best we can only assume that they are confusing us with someone else. Again, please refer to our Deadline 2 Written Representation [REP2-380]. The applicant's claim that "culverts beneath the bypass will enable the continued flow of the existing drainage network" also neatly demonstrate a complete lack of understanding of the specifics of the situation and their lack of engagement with us. Their documentation shows that the TVB will be in 1.9 m deep cutting at the point that it crosses our existing drainage route, putting the suggested culvert at least 2 m below both the ground-level inlet on the Mollett's Farm side and the ground-level outlet on the Friday Street side. Once our water has dropped into their cutting, it will not be going anywhere but downhill – along the route of the TVB. 1.10. Conclusion We have put our lives into this business and built something special. We have fabulous reviews and a high percentage of repeat customers. We are happy to share our valuations and other documentation with the ExA as proof. All this is at risk by something completely and wholly outside our control. We ask, nay beg, that this continual misrepresentation and denial by the applicant be halted and they step up and do the right thing. We understand that it is just business to them and that others will benefit from this road, but this is our lives, our future, our dreams, hopes and aspirations that are being crushed, and whilst we recognise we are not supposed to be emotional but factual, it feels like the facts are not being heard, recognised or acknowledges in any way and that EDF simply repeats the same nonsense and quite frankly untruths and nothing changes. We are a small business – especially in comparison to EDF – and do not have the time, resources (staff or financial) to keep going round in circles like this. EDF keep telling us there will be no impact on us. If this is the case, then they should have concerns putting their money where their mouth is and indemnify us against any impact that results from their activities.
	Response by SZC Co. at Deadline 5	Proximity SZC Co.'s response at Deadline 2 remains valid.

ExQ1	Question to:	Question:
		Noise The noise assessments consider effects at buildings of varying sensitivities, as set out in **Table 4.1** in **Volume 5, Chapter 4** of the **ES** [APP-415]. This reflects the guidance in DMRB LA111, which describes 'noise-sensitive receptors' as: *'Receptors which are potentially sensitive to noise.* *NOTE: Examples include dwellings, hospitals, healthcare facilities, education facilities, community facilities, END quiet areas or potential END quiet areas, international and national or statutorily designated sites, public rights of way and cultural heritage assets.'* The assessed receptor location at Mollett's Farm is considered representative of the effect at the larger group of buildings at the site, rather than at a single building and SZC Co. is content that the potential effect has been quantified appropriately. Notwithstanding the appropriateness of the submitted assessments, in response to a request from Mollett's Farm SZC Co. has agreed to provide additional information on the potential impacts within the wider Mollett's Farm landholding, in particular within their camping area to the south of the buildings. A number of detailed criticisms are set out in the Acoustic Review Report, prepared by Acoustical Control Consultants (ACC). SZC Co. has set out its responses here. At paragraph 5.2 ACC states: '*However, the key point of paragraph 4.3.41 is that there is a contradiction. It states that the baseline character was established by monitoring i.e. a survey, but that the assessment was based on calculated levels not the results of the survey*.' This point is reiterated in more detail in paragraph 6.1: '*The baseline noise levels used for the assessment of road traffic noise were predicted by modelling rather than derived from the survey results. There are several reasons for this. The principal reason is that the assessment of the impact of the sound from the operation of the road is based on the expected traffic flows at the future assessment date. Therefore, there is an expectation*

ExQ1	Question to:	Question:
		that road traffic flows will increase anyway regardless of whether or not the bypass goes ahead. The changes in noise levels that would be expected from these increases on the existing roads are therefore predicted using modelling. However, to be robust the model should be calibrated against the current measured baseline. This does not appear to have been done.' The baseline scenario for the assessment of road traffic noise should be the calculated values for each assessment year, as required in DMRB LA111, which states at paragraph 3.45: *'The operational noise baseline shall be determined from do-minimum noise levels in each assessment year.'* The do-minimum noise levels in each assessment year must be calculated values, since in this instance, the assessment years are in the future. The purpose of noise monitoring data in a road traffic noise assessment has varied in successive versions of the relevant part of DMRB. Prior to November 2019, the relevant part of DMRB indicated that baseline measurements should be undertaken, but there was no requirement to use them as part of the assessment. DMRB LA111, published in November 2019, required baseline measurement to validate road traffic noise calculations and to inform public consultations. However, measurements at some distance from a road, as was the case for Mollett's Farm, may not correlate that well with CRTN predictions, particularly when road traffic noise is not a prominent component of the measurements. The May 2020 revision of DMRB LA111 recognised the implications of requiring calculations to be validated with measurements, and it reduced the role baseline monitoring should play in a road traffic noise assessment, stating at paragraph 3.45.1: *'Noise monitoring should be used to inform baseline noise modelling results and to provide data for public consultation purposes.'* It is noted that where road traffic noise was dominant during baseline measurements, which was the case during the daytime at monitoring location TVB8 The Old Police House, there is good correlation between the measured levels of 64 to 66dB $L_{Aeq,T}$ and the calculated baseline $L_{Aeq,16hrs}$ value of 67dB shown in Table 4.14 in **Volume 5, Chapter 4** of the **ES** [APP-415]. At paragraph 9.1, in their conclusions, ACC states: *'The baseline sound levels used to represent Mollett's Farm are not adequate for a proper assessment. The measurement*

ExQ1	Question to:	Question:
		durations were too short, the location was unrepresentative, one of the key indicators was not reported and the absence of weather data in the survey report means the validity and relevance of the results cannot be determined.' As stated above, the baseline scenario in the road traffic noise assessment using DMRB LA111 is correctly based on the calculated 'do-minimum' sound levels. The baseline measurements are reported for public consultation purposes, but in this instance, the measurements were not overly influenced by road traffic noise, and therefore do not alter the calculated values. ACC note at paragraph 6.10 that: '*The baseline value for daytime LA10 given in the assessment tables is 52.4 dB. The results of the ACC survey indicated that a value closer to 47 or 48 dB would be more appropriate for the prevailing wind conditions. On this basis the differences would increase by around 5 dB which would result in a major adverse effect in all three daytime scenarios*.' This conclusion does not take account of the calculated baseline noise levels in the road traffic noise assessments, starting at Table 4.18 in **Volume 5, Chapter 4** of the **ES** [APP-415] being façade values and therefore inherently 2.5dB higher than their measured free-field values. SZC Co. considers ACC's claim that the impact is under-estimated by 5dB to be incorrect in the context of the DMRB LA111 procedures and the façade nature of the daytime predictions. Given this and the limited role of baseline measurements in an assessment of road traffic noise in line with DMRB LA111, SZC Co. considers the submitted assessment to be appropriate and robust. ACC sets out the results of their own baseline noise monitoring, undertaken over a week in April 2021. There is no statement on the effect, if any, of the Government's restrictions due to the Covid-19/coronavirus pandemic that were in place at that time. It would be useful to understand whether ACC consider the traffic flows at that time to have been truly representative of what might be considered 'typical' conditions. It is also noted that ACC has removed the noisiest two hours of data from each day surveyed, from 05:00 to 07:00 hours, on the basis that the frequency content of the measurements was considered to be consistent with birdsong; ACC concluded that the elevated levels were related to the dawn chorus, and removed them all.

ExQ1	Question to:	Question:
		It is understood that the dawn chorus typically occurs for approximately an hour around sunrise, which was between 05:43 hours at the start of ACC's survey and 05:29 hours at the end of the survey. The removal of the noisiest two hours of data appears excessive on this basis. Notwithstanding this, the baseline noise data reported in Table 4.13 in **Volume 5, Chapter 4** of the **ES** [APP-415] was dominated by natural sounds, with road traffic noise on the A12 audible in the background at a low level, as stated in **Volume 2, Appendix 11A, Annex B** of the **ES** [APP-203]. The baseline measurements therefore included elements of natural sound that ACC appear to have removed from their data. ACC notes that the baseline values in Table 4.14 of **Volume 5, Chapter 4** of the **ES** [APP-415] were 4.4dB lower than the baseline values in Tables 4.18 to 4.20 in **Volume 5, Chapter 4** of the **ES** [APP-415], despite paragraph 4.4.13 stating that a correction of -2dB was applied to convert the $L_{A10,18hrs}$ values to $L_{Aeq,16hrs}$ values. This discrepancy is due to the daytime $L_{A10,18hrs}$ values in Tables 4.18 to 4.20 being façade values, and the baseline values in Table 4.13 being free-field values, and rounded to the nearest decibel. The daytime $L_{A10,18hrs}$ façade value of 52.4dB for Mollett's Farm is converted to a façade $L_{Aeq,16hrs}$ value by subtracting the 2dB stated in paragraph 4.4.13 to obtain a value of 50.4dB. This is then converted to a free-field value by subtracting 2.5dB, as defined in CRTN, to obtain a value of 47.9dB. This rounds to 48dB. At paragraph 9.1, in their conclusions, ACC states: '*The baseline sound levels used to represent Mollett's Farm are not adequate for a proper assessment. The measurement durations were too short, the location was unrepresentative, one of the key indicators was not reported and the absence of weather data in the survey report means the validity and relevance of the results cannot be determined*.' As stated above, the baseline scenario in the road traffic noise assessment using DMRB LA111 is correctly based on the calculated 'do-minimum' sound levels. The baseline measurements are reported for public consultation purposes, but in this instance, the measurements were not overly influenced by road traffic noise, and therefore did not alter the calculated values. At paragraph 9.2, ACC states: '*The methodology of the noise assessment follows established practice for this type of assessment, but this does not adequately evaluate the specific impact on the tranquillity of Mollett's Farm*.'

ExQ1	Question to:	Question:
		The assessment of tranquillity is set out in **Volume 5, Chapter 8** of the **ES** [APP-429] with further detail in **Volume 5, Appendix 8A** of the **ES** [APP-430]. The assessment location closest to Mollett's Farm is TVB7, where the change in tranquillity was found to change from fairly tranquil to not quite tranquil, in the long-term. At paragraph 9.3, ACC states: *'Wind direction has a significant effect on sound propagation. The assessment methodology is based on a comparison of predicted levels for the existing and proposed routes that assume downwind propagation to the farm from both. This is unrepresentative as the farm is located between the two routes. The prevailing wind direction is such that sound from the proposed route will have favourable propagation conditions to the farm much more often than the existing route.'* It is correct to say that the wind direction inherent in the calculations is moderately adverse, which is to say that the wind is assumed to blow from each source to every receptor. It is accepted that this cannot occur in practice, as it requires the wind to be blowing in several directions at once. However, that assumption is intrinsic to the CRTN calculation method, and that is the calculation method that is required by DMRB LA111; this is not the result of a decision made by SZC Co. At paragraph 9.5, ACC states: 'The assessment predicts adverse impacts at several stages of the road construction process. It is vital that the Construction Noise Management Plan for the road scheme includes monitoring of noise levels and extensive liaison with residents about the location and duration of high noise activities.' The **Code of Construction Practice** (Doc Ref. 8.11(C)) requires advance notification of noisy or disruptive works in Part A, Section 3.1(f), and monitoring is proposed at locations to be agreed with the local planning authority, as set out in Part C, Section 3.3(b). Further detail will be submitted in the Noise Monitoring and Management Plan for the works. In conclusion, SZC Co. does not consider the comments set out in ACC's review to be well-founded, and is content that the submitted assessment is both reasonable and robust. Visual Effects The landscape and visual effects are set out in **Volume 5, Chapter 6** of the **ES** [APP-421], as updated by **Volume 1, Chapter 5** of the **ES Addendum** [AS-184]. The assessments concluded that small scale effects would arise on the landscape character in

ExQ1	Question to:	Question:
		the fields around Molletts farm (not significant) during construction and operation. In terms of visual amenity, which is looking at specific changes in views (from residential property, users of PRoW etc), the visual assessment notes that Groups 1 and 2 (Molletts Farm lies between these receptors) are likely to experience significant effects during construction. By Year 15 of operation, the effects would be moderate adverse (not significant) as the proposed planting will have matured. The Applicant is engaging with the Interested Party has met with the owners of Molletts Farm (most recently on 21st July 2021) in relation to landscaping proposals for the Two Village Bypass. A12 Access The Two Village Bypass is intended to reduce the traffic on this section of the existing A12, in addition there is a proposal to reduce the permanent speed limit from 60mph to 40mph from the village of Farnham to the Friday Street roundabout which will result in improvements to access and egress from Molletts Farm During the construction of the Two Village Bypass the traffic flows will be lower than during the peak years of the construction programme, in particular cars and buses. In advance of the Two Village Bypass opening the HGVs using the existing A12 will be managed through both the Delivery Management System and Freight Management Facility to regulate the flow of HGVs along the A12. Amenity Access The Applicant is liaison with the Interested Party and the adjoining landowner at Friday Street Farm regarding the current accessibility between the two businesses on private land, partially along a Public Right of Way, and it is exploring mitigation measures available to this. The Public Right of Way is proposed to be partially diverted and cross the new road on a similar alignment to currently. Business Opportunity The Applicant has met with the Interested Party again recently regarding potential business opportunity associated with the construction of the project. Reference should be made to the Applicant's response in **Comments on Written Representations** at Deadline 3 [REP3-042].

ExQ1	Question to:	Question:
		Mitigation A number of noise control measures were considered during the design process of the two village bypass, including the use of low noise road surfaces, barriers and bunds and maximising the benefit of natural ground features, such as cuttings, to increase the level of noise attenuation. It is noted, however, that the road is designed in outline terms within certain design parameters, and the final design details are not yet fixed. There will be opportunity for further noise control measures to be incorporated into the detailed road design. Further noise control measures may include the use of a quiet road surface. This further mitigation measure will be discussed with Suffolk County Council (SCC) and documented in the Statement of Common Ground. The Applicant is in liaison and has met with Molletts Farm in relation to landscaping and noise matters including potential mitigation in relation to the Two Village Bypass. Water Supply and Drainage The design of the two village bypass takes account of existing drainage arrangements on adjacent land such that there is no adverse impact on adjacent 3rd party landowners. The drainage issues accommodated are both overland flow across the surface of the land and underground land drainage networks provided for the draining of farmland. The construction of the bypass will result in changes to the route of overland flow. Accommodating overland flow from adjacent land has been allowed for in the design of the highway drainage infrastructure. Where the road is in cutting, a cut off ditch will be provided at the top of the cutting to collect and remove the overland flow. Where the road is on embankment a swale ditch will be provided at the base of the embankment and this will collect overland flow from adjacent land. Reference should be made to the Applicant's response to the Interested Party at Deadline 2. There is no assumed impact to any underground agricultural drainage on the Interested Parties land as the road will be constructed in adjacent land. SZC Co.'s specialist drainage consultant spoke with the Interested Party on 15th July 2021 to discuss the concerns relating to drainage and irrigation, and will continue to liaise with the Interested Party

ExQ1	Question to:	Question:
		(and neighbouring landowners)regarding their drainage and irrigation and how any potential impacts on this can be mitigated.
SE.1.13	The Applicant	**Displacement of Visitors** The RSPB [RR-1059] express concern that the ES does not adequately assess the impacts on visitor numbers and consequently appropriate mitigation for such affects has yet to be provided and subsequently delivered by an appropriate mechanism through the DCO. Please respond to these concerns and advise on the latest position in respect of any ongoing discussions with the RSPB.
	Response by SZC Co. at Deadline 2	A response on the adequacy of assessment of visitors, addressing additional pressure from displaced recreational visitors and the potential for construction workers to visit RSPB Minsmere is set out in response to question **AR.1.12**. SZC Co. recognises the importance of the inbound tourist economy within and around the Suffolk coast, and has undertaken an assessment of the effects of the Sizewell C Project on tourism, in-line with the requirements of National Policy Statement EN-1, as part of **Volume 2, Chapter 9** (Socio-economics) of the **ES** [APP-195]. This sets out that there is limited empirical evidence that the Sizewell C Project would lead to a quantifiable reduction in visitor numbers, a change in visitor behaviour, expenditure or business viability in the sector over and above normal variation, particularly when a Tourism Fund is applied. The use of a Tourism Fund for marketing, promotion, and other projects to the benefit of the image of tourism at the Suffolk coast is considered an effective way of providing precautionary mitigation for perceived risks as demonstrated by experience at Hinkley Point C – where similar concerns of effects were raised by Interested Parties, but have not manifested into actual effects on tourism in Somerset – has provided evidence for the positive effect of a Tourism Fund used to promote and market the area and provide information to visitors and prospective visitors. Monitoring of business confidence through governance, as well as public datasets such as tourist-sector employment[5] and tourism

[5] ONS (2019) Business Register and Employment Survey. Accessed via NOMIS (https://www.nomisweb.co.uk/) on 21/5/21

ExQ1	Question to:	Question:
		spend[6], has shown no adverse effect on the Somerset tourist economy from the construction activity at Hinkley Point C where a Tourism Fund has been applied. A paper setting out further details on Sizewell C's consideration of ex-ante stated preference surveys, and experiential evidence of the effectiveness of a Tourism Fund drawing on Hinkley Point C evidence is included as an **Appendix 23A** of this chapter (Response Paper – Tourism – Ex-ante Stated Preference Surveys and Hinkley Point C Evidence). In some cases, where effects on sensitive receptors cross-cut socio-economic and environmental topic areas and there are multiple potential effects which would benefit from comprehensive and holistic mitigation, separate Resilience Funds (see **Draft Deed of Obligation,** Schedule 13 (Doc Ref. 8.17(C)) are proposed, including one for RSPB Minsmere and one for National Trust Dunwich Heath. This will ensure that the activities funded through those measures do not overlap but can complement the plans, programmes and projects supported by the proposed Tourism Fund (and other funds, where applicable). Regular discussions are ongoing with RSPB and it is understood that they would like their Resilience Fund to focus on paying visitors. The scope and quantum of potential measures has not yet been agreed but is under discussion.
	Response by RSPB at Deadline 3	Please see our response to AR.1.12 regarding the assessment of additional recreational pressure on RSPB Minsmere. As stated in the Applicant's response, discussions regarding the Resilience Fund are ongoing.
	Response by SZC Co. at Deadline 5	Please see SZC Co.'s response at Deadline 5 to AR.1.12 and the Written Summary of Oral submissions for ISH7 (Doc. Ref 9.47).
SE.1.15	The Applicant	**Pressure for skilled labour** Essex CC [AoC-003] express concern over cumulative effects on socio economics, tourism, the supply chain for materials and workforce, with ongoing effects on broader economic objectives/infrastructure projects. How have the in-combination effects of other major

[6] Visit Britain / Visit England (2018) Great Britain Tourism Survey. Available at https://www.visitbritain.org/

ExQ1	Question to:	Question:
		infrastructure projects been considered and sought to be addressed to avoid problems of shortages as expressed by Essex CC.
	Response by SZC Co. at Deadline 2	The in-combination effects on the regional labour market have been addressed in **Volume 10, Chapter 4** (Assessment of Cumulative Effects with Other Plans, Projects and Programmes), **Section 4.3** (Socio-economics) [APP-578]. Further detail to that assessment has also been provided specifically on the demand for sub-elements of construction skills in **Appendix 23B** - Response Paper – Cumulative Effects (Skills and Labour Market). This summarises that – in terms of the labour market of construction skills: - There is not considered to be a significant in-combination effect on demand for construction skills within the labour market - In part, this position is supported by the raft of employment, skills and education initiatives for the Project and the wider region set out at Schedule 7 of the **Draft Deed of Obligation** (Doc Ref. 8.17(C)), and within relevant skill plans for other regional infrastructure projects. - Notwithstanding this, SZC Co recognises the Project's responsibility to work collaboratively with regional partners to plan for legacy skills and has built this in to governance and implementation measures within Schedule 7 of the **Draft Deed of Obligation** (Doc Ref. 8.17(C)). SZC Co. has also developed a **Supply Chain Strategy** [APP-611] as part of the DCO application, which is intended to support the regional business community to compete for and win work on the Project, with the effect of securing economic benefits and avoiding 'shortages'. Please also see the response to question **SE.1.39**.
	Response by Stop Sizewell C at Deadline 3	Pressure for Skilled Labour In responding to concerns expressed by Essex CC regarding cumulative effects on demand for materials and workforce, the Applicant states that: "there is not considered to be a significant in-combination effect on demand for construction skills within the labour market".

ExQ1	Question to:	Question:
		However, the Applicant has elsewhere stated that the previous experience of the construction of Sizewell B is a relevant source of evidence. In particular, in response to SE.1.3 they state that at its peak, 30% of the Sizewell B workforce had been recruited from other local employers. Moreover, a further 50% of the workforce on that project were working on site with their current employer (i.e., as sub-contractors), which is another mechanism by which displacement can occur – i.e., via effect on local supply chains. The potential effect on supply chains is a key consideration. However, even if the potential effects on the local contractor supply chain is set aside, the previous experience of 30% peak recruitment from other local employers must be regarded as a substantial adverse effect. The Applicant's conclusion that this scale of potential effect is insignificant is not robust or credible.
	Response by SZC Co. at Deadline 5	Labour market churn is a normal feature of the labour market and the construction sector in particular. People moving jobs is a good thing – they are usually moving for better pay and conditions or working hours that suit them better. Businesses cope with this all the time. In normal times around 650,000 people start a new job and 650,000 people leave a job every month – nearly 8 million in each direction per year out of 29m people in employment. That's over 25% churn each year (HMRC PAYE Real Time Information - job starts and job exits, two years to May 2021 (Figure 4)) This isn't something that needs to be regulated by the planning system. It is government policy to support flexible labour markets and to leave employers and workers to negotiate terms and conditions themselves The construction industry has particularly short job tenure. 2019 CITB data for the East of England shows: • 38% of workers are on temporary contracts and only 18% of them expected to be working for the same company or agency in 12 months time • Only 13-23% of all workers expected to be on the same site in 12 months time A worker moving from one site to another is not displacement, and whilst Sizewell C is a large individual project, it's demand for home-based construction employment is a small proportion of construction activity in the CDCZ, even at the peak (around 5% of all

ExQ1	Question to:	Question:
		construction sector jobs in the CDCZ). Sizewell C will actually offer more certainty and security to construction workers. It is known that the supply of labour isn't fixed. When more jobs and hours are available, more people seek more work. There is consistently around 35,000-40,000 people in Suffolk meeting the ILO definition of unemployment (see **Plate 5.2** in the **Economic Statement -** [APP-610]). The Project represents a massive opportunity regardless of any additional intervention, but even so, SZC Co is proposing a package of measure to help ensure people seeking work have access to skills and training and that employers who lose staff to the project can access potential workers through the SZC jobs service. There is broad agreement on these measures with the local authorities and support from the private sector, including the LEP and the Chamber. The **Initial SoCG** [REP2-076] sets out that: a) **SE18** - Principle of activities for employment, skills and education is agreed – subject to development of detail and funding. b) **SE46** – Employment, skills and education scope and governance is developed at a high level - discussions on quantum will be held between SZC Co, ESC and SCC to provide confidence to the Councils on efficacy of the measures; and detailed delivery mechanisms for individual elements to be developed.
SE.1.32	The Applicant	**Home Based Workers** ESC [RR-0342] criticises the assessment of the proportion of homebased workers to be employed that are already in employment. (i) Please respond to this concern and support your response with evidence as to how you arrived at the range of 42% to 50%[APP-610 section 5.4] (ii) In the event the figure were inaccurate either higher or lower, what implications would this have for the conclusions reached within the ES? (iii) In undertaking such assessments, a number of assumptions are made. Would it be more reasonable to suggest that in the conclusions there would be a range of the proportion already in employment? (iv) If so, what percentage range would this be?

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 2	Response to (i) The **Economic Statement** [APP-610] reviews primary and secondary data on the source of labour for new jobs created – this draws on: • Research by the Resolution Foundation[7] that shows that depending on the economic cycle, between 40% and 52% of new jobs are filled each year by people not currently working - including those entering the labour market for the first time or moving from a period of economic inactivity or unemployment. The corollary is that the rest of the new jobs created each year across the economy are filled by those moving job (between 48% and 60%). By its nature, this research does not consider specific interventions which would result in new jobs being filled by people already in work, but whose work changes as their firm wins a contract on the Sizewell C Project. • Experience from Sizewell B[8], which notes that around 20% of locally recruited employees had previously been unemployed or economically inactive and around 30% (600 of 2,200) recruited in the peak recruitment year had come from other local employers – the corollary being that the remaining 50% would move to work on the Sizewell C Project without changing jobs (i.e. moving with their existing employer). Using these data, it is reasonable to expect that depending on the point in the economic cycle, between 48% and 80% of HB recruits would already be in employment, and between 20% and 52% could come from unemployment, economic inactivity, or be new entrants to the workforce. Response to (ii) SZC Co. understands that the concern raised here may be twofold: • That the number / proportion of workers recruited from unemployment/economic inactivity/new entrants to the labour market is too high, and therefore that;

[7] Gregg, P and Gardiner, L for Resolution Foundation. A Steady Job? The UK's record on labour market security and stability since the millennium. July 2015. Available at: https://www.resolutionfoundation.org/app/uploads/2015/07/A-steady-job.pdf

[8] Glasson, J and Chadwick, A. The local socio-economic impacts of the Sizewell B PWR power station construction project 1987–1995: Summary report. Impacts Assessment Unit: Oxford Brookes University. 1995

ExQ1	Question to:	Question:
		• The assessment does not properly consider the subsequent effects of those recruited from existing employment on displacement/churn in the labour market. SZC Co. considers that using a lower end of the evidenced range of recruitment from unemployment/economic inactivity/new entrants to the labour market set out above (20%, or 480 people at peak) means that the remaining proportion from existing employment (80%) is a conservative approach to addressing potential displacement and labour market churn effects. The former is considered to be achievable when considering: • The evidence from Sizewell B and the Resolution Foundation set out above; • The fact that there is consistently around 35,000-40,000 people in Suffolk meeting the ILO definition of unemployment (see **Plate 5.2** in the **Economic Statement** [APP-610] (and this does not include new entrants to the labour market – especially those being targeted by SZC Co.'s proposed measures such as Young Sizewell C; and • That there will be substantial intervention in outreach and skills and education, as set out within Schedule 7 of the **Draft Deed of Obligation** (latest draft Doc Ref. 8.17(C)). As such, the assessed proportion of HB workers moving from existing employment is considered to represent a conservative approach and thereby does represent a proper assessment of the likelihood of effects on labour market churn. Response to (iii) and (iv) Bringing people into work from worklessness is an important part of the drive for sustainable employment and upskilling linked to improved social mobility – SZC Co. and regional stakeholders including SCC, ESC and NALEP are collaborating to develop the scope, implementation plans and governance proposals for the measures set out in the **Employment, Skills and Education Strategy** [APP-611]. The approach to developing project assumptions, and then developing enhancement measures with flexible and responsive governance, takes into account that the Sizewell C Project has long construction phase, likely to pass through at least one economic cycle. The development of Workforce Delivery Strategies and Annual Workforce Delivery Implementation Plans would allow stakeholders to develop the approach to implementation of enhancement measures secured in the **Draft Deed of Obligation**

ExQ1	Question to:	Question:
		(latest draft Doc Ref. 8.17(C)) reactively to the phase of the project and the economic climate. As such, SZC Co. acknowledges that throughout the construction phase, different proportions of the workforce will be drawn from those currently in work and those that are unemployed or economically inactive, and there could be a range of different proportions at different points within the construction phase. The assessment case has used a reasonable worst-case in terms of consequent socio-economic effects in order to be conservative in terms of development of mitigation.
	Response by Stop Sizewell C at Deadline 3	Home Based Workers The Applicant has provided a detailed response regarding concerns about the proportion of homebased workers who would be already in employment. In particular, the Applicant draws upon two separate stands of evidence: ● A research report published by the Resolution Foundation in 2015, which concluded that – depending on the economic cycle – between 40% and 52% of new jobs filled each year are filled by people not currently working (i.e., by those entering the workforce for the first time, or those re-joining the workforce after a period of unemployment or inactivity). ● The previous experience of constructing Sizewell B (referred to in the response to SE.1.3 above) which states that around 20% of the peak workforce had been previously unemployed or economically inactive. However, neither of these sources can be regarded as a sound basis for estimating the likely proportion of the Sizewell C workforce that would be filled by people not currently working. Starting with the second strand first (Sizewell B), the reason for doubting the relevance of this finding is articulated clearly by SZC Co. themselves in their response to SE.1.5, as noted above. That is, in responding to SE.1.5 the Applicant stated that in comparison to when Sizewell B was built (1988-1995), the Construction industry is now "structured very differently with respect to qualifications and competencies". The evolution of the skills needs of the Construction sector (as measured by qualifications levels of the UK construction workforce) can be clearly seen in the trend data for the ONS Labour Force Survey. The increasing requirement for skills and qualifications over the past 30 years or so means that the experience of the 1980s/early 1990s is not a valid comparison with which to develop assumptions about the labour market response in the

ExQ1	Question to:	Question:
		2020: i.e., changing technology and processes means that the skills needs of the industry have evolved since the later 1980s. A further relevant consideration is that the national unemployment rate was significantly higher throughout the 1988-1995 period when Sizewell B was built compared to the current situation. Therefore, there is likely to be fewer undeployed workers with relevant skills waiting to be recruited from the available local pool of unemployed workers. Although the other strand of evidence – the Resolution Foundation research (2015) – in itself is a good piece of research, it is, in our view, an inappropriate evidence base upon which to develop assumptions about the likely local labour market response for the Sizewell C project. This is because it is national research that covers the labour market as a whole and all industries together: in other words, the 40%-52% finding is an average response for all workers across all UK industries. Moreover, the relevance of this research to the Sizewell C and Suffolk situation is weak because the UK Construction sector is not 'average' in terms of the characteristics of its workforce or the requirements it has for workforce skills. Neither is the Suffolk workforce 'average' in terms of its demographic characteristics compared to the rest of the UK. For example, data from the ONS suggests that rates of workforce churn are highest among sectors such as: Accommodation; Food & beverage services; Retailing; and Arts, Entertainment & Recreation. These industries generally also have a lower skills requirement (compared to Construction) and are therefore likely to be making an above-average contribution to the 40%-52% finding reported by the Resolution Foundation. For all these reasons, Stop Sizewell C cannot agree with the Applicant that their approach to assessing the scale of potential recruitment from other local employers is either a conservative or proper assessment.
	Response by SZC Co. at Deadline 5	Please see the response at SE.1.15. The Project represents a massive opportunity regardless of any additional intervention, but even so, SZC Co is proposing a package of measure to help ensure people seeking work have access to skills and training and that employers who lose staff to the project can access potential workers through the SZC jobs service. The Project also offers specific outreach activities – set out in **Schedule 7** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E)) – to enable people to overcome barriers to employment and effectively move from worklessness to employment.

ExQ1	Question to:	Question:
SE.1.37	The Applicant	**Displacement** Concern is expressed by ESC [RR-0342 para 1.165] over the definition of displacement and whether it would actually be significant. Please respond to this concern and support it with evidence in terms of the degree of effect on the local economy and what could be done and delivered through the DCO to ensure any adverse effect is minimised.
	Response by SZC Co. at Deadline 2	Displacement in this context has a very precise definition. It is defined by HM Treasury Green Book[9] as: *"the degree to which an increase in economic activity promoted by an intervention is offset by reductions in economic activity elsewhere".* In the context of the Sizewell C Project, that means that if displacement were to occur, economic activity would reduce or cease elsewhere in the local area as a direct result of Sizewell C going ahead. There is no evidence that displacement will occur at any significant level. Only some of the workforce would be recruited from another companies and move to work on the Sizewell C Project - many will get work through their existing employer, with that firm having been awarded a contract and becoming part of the project in this way. Some of the workforce will be entering or re-entering the labour market. The construction industry is peripatetic. Workers spend relatively short periods on a site and then move to another - typically only between 13% and 23% expect to be working on the same site for more than a year, and up to half less than six months . A worker moving from one site to another is not displacement as defined above, and whilst Sizewell C is a large individual project, it's demand for home-based construction employment is a small proportion of construction activity in the CDCZ, even at the peak (around 5% of all construction sector jobs in the CDCZ). A worker or a contractor moving company to work at Sizewell C is not itself displacement - the jobs or contract they left behind would have to cease to exist for it to be displacement. The likelihood of that activity ceasing to exist is very low - if a local business lost a worker to a Sizewell C, that employer could fill that vacancy by recruiting a new worker, by promoting from within, or by increasing the hours of existing staff. They

[9] HM Treasury (2018) The Green Book: Central government Guidance on Appraisal and Evaluation.

ExQ1	Question to:	Question:
		are highly unlikely to allow profitable activity to stop because they have a vacancy. That vacancy may be harder to fill, but that is still not displacement. Further detail on this is set out in the **Economic Statement** [APP-610] and in **Volume 2, Chapter 9** (Socio-economics) of the **ES** [APP-195]. Furthermore, measures are proposed to address the risk of harder-to-fill vacancies: SZC Co. has been working with ESC, SCC, NALEP and the Suffolk Chamber of Commerce on the following measures which are set out in draft in the **Draft Deed of Obligation** (Doc Ref. 8.17(C)): • A Sizewell C Jobs Service will be open to local employers, who will be able to access the skilled pool of labour generated by the project to assist in backfilling. Monitoring will be undertaken via supply chain engagement to make sure opportunities for local firms are not missed. Jobs Service analytics may be used to monitor a sub-section of movement between the Sizewell C Project and wider employment market. • Local firms will be supported through local supply chain engagement activities to improve competencies to win work on the Sizewell C Project, helping them to retain staff while benefiting from the project. SZC Co., NALEP and the Suffolk Chamber of Commerce are also working on plans to develop skills, competencies and qualifications within the supply chain. • Upskilling will benefit the Sizewell C Project and the wider market – focus will be on 'legacy' roles (as determined by SCC's research base) that the region and the project both need for the long term. SZC Co., ESC and SCC are meeting regularly to develop the scope, implementation plans and governance proposals for the measures set out in the **Employment, Skills and Education Strategy** [APP-611], that will be secured by the **Draft Deed of Obligation** (latest draft Doc. Ref 8.17(C) - see Schedule 7). Broad scope and implementation has been agreed for most of the key measures - including the ASEC Fund, Outreach Fund, Skills and Student Bursary, contribution for Funding for Regional Skills Coordination. The scale of financial contributions has still to be discussed.

ExQ1	Question to:	Question:
		Notwithstanding this, SZC Co notes that for a similar project – Hinkley Point C – the Examination Panel concluded in its Recommendation Report[10] that in terms of displacement '*we find little evidence to support fears of worker displacement and conclude that this is not a factor that should attract significant weight in the Secretary of State's decision as to whether or not to make the DCO'* (paragraph 4.123). To-date no evidence has been produced to demonstrate that displacement has occurred.
	Response by Stop Sizewell C at Deadline 3	Displacement The Applicant claims that the concept of displacement has a 'very precise definition' and that it is defined by HM Treasury's Green Book as: "*the degree to which an increase in economic activity promoted by an intervention is offset by reductions in economic activity elsewhere"*. However, the Green Book is not the only place where Government advises on the correct approach to assessing displacement. Indeed, on page 2 of the Green Book the role of supplementary guidance is clearly stated, as follows: Supplementary departmental guidance is produced by Departments and arms-length public organisations. It deals with the application of the Green Book in the particular context that is the organisation's area of responsibility. (HMT Green Book, 2020, p2) In the case of planning decisions, an important place to look for supplementary guidance is the Ministry of Housing, Communities and Local Government (MHCLG) Appraisal Guide (December 2016). Section 4 of this document provides information on how project additionality factors – including displacement, leakage, and multiplier effects – should be treated in assessing projects. However, when it comes to detailed guidance on the quantification of additionality factors (including displacement), the MHCLG Appraisal Guide (December 2016) provides the following advice: "A useful guide to additionality and how users might decide appropriate levels of additionality is the Homes and Communities Agency Additionality Guide". The HCA Additionality Guide (Fourth Edition, 2014) contains much more specific advice and case study examples of how project assessors should quantify additionality factors for

[10] DECC (2013) Secretary of State Letter for Hinkley Point C. Available at: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010001/EN010001-000017-130319_EN010001_SoS%20HPC%20Decision%20Letter.pdf

ExQ1	Question to:	Question:
		different types of projects. This document contains the following specific statement about the construction phase effects of projects: Displacement arises where the intervention takes market share (called product market displacement) or labour, land or capital (referred to as factor market displacement) from other existing local firms or organisations. For example, an intervention may help a business to expand its operations. However, this business may take market share from other local firms producing the same goods or services, resulting in them losing trade and possibly staff. Alternatively, the supported business may use up scarce local factors of production (such as skilled labour) or bid up factor prices. (HCA Additionality Guide, p28, emphases added) On the same page the document goes on to say: The scale of displacement effects will vary depending upon the nature of activity supported and local markets. For example, if the supported business has few local competitors, then the level of product market displacement will be low. In terms of factor market displacement, an intervention may result in an increase in demand for construction workers. If these are in short supply, the result may be delays to this or other interventions or an increase in costs. (HCA Additionality Guide, p28, emphases added) It simply could not be clearer that the HCA Additionality Guide regards competition for skilled workers – and with construction workers cited as a specific example – is a key consideration in the assessment of displacement. Yet it is clear from their response to SE.1.37 that the Applicant is either unaware of or is unwilling to acknowledge the detailed advice on construction phase additionality from a leading national Government regeneration agency (and which is advice endorsed by MHCLG). In its SE.1.37 response the Applicant states: A worker or contractor moving company to work at Sizewell C is not itself displacement. SZC Co's interpretation of displacement is narrow, inappropriate and in basic contradiction to detailed Government guidance on the topic. As a result, the Applicant's assessment of the Economic Benefits associated with the Sizewell C project is completely unsound, with its quantified impacts likely to be very substantially overstated. Although we have emphasised the potential effects on existing local businesses of the competition for skilled workers, there may also be other effects, such as increased

ExQ1	Question to:	Question:
		competition (and therefore increased prices) for raw materials, haulage, specialist equipment and other factors of production. But none of this appears to have been assessed by the Applicant.
	Response by SZC Co. at Deadline 5	The response makes reference to other Government guidance on displacement. As the Stop Sizewell C response itself notes, this is guidance on the application of the Green Book. It does not change the definition of displacement, it provides guidance on how to measure it. The MHCLG 2016 Appraisal Guide (which the response also references) defines displacement in the same terms as the Green Book (p.41 footnote 38): *"The degree to which an increase in productive capacity promoted by government policy is offset by reductions in productive capacity elsewhere"* The response then draws on the HCA Additionality Guide. It states that competition for skilled workers is a "***consideration*** *[emphasis added] in the assessment of displacement."* It does not change the Green Book definition of displacement (ie the loss of economic activity from elsewhere). The SZC Co statement that "*a worker or contractor moving company to work at Sizewell C is not* ***itself*** *[emphasis added] displacement*" remains true. It only becomes displacement if economic activity elsewhere is reduced. Stop Sizewell C is therefore wrong to claim that the definition is "*narrow, inappropriate and in basic contradiction to detailed Government guidance on the subject.*" SZC Co has used the primary definition (from the Green Book) and followed the subsidiary guidance on the application of the Green Book. It has considered the potential for displacement to arise and concluded that it is unlikely to be significant, especially in the light of the evidence from HPC and SZC's significant support for skills and training and for "backfilling" into vacancies at non-project employers. There is no evidence from Stop Sizewell C (or any other interested party) that economic activity would be reduced elsewhere, even if employers lose staff to the project

ExQ1	Question to:	Question:
SE.1.42	The Applicant, ESC, SCC	**Freight Management Strategy** A number of RRs including [RR-0040] expressed concern that the original application would cause economic harm by severing communities and reducing the quality of the environment which is an important contributory factor to the tourism sector. Would an increase in rail and seaborne freight provide an economic benefit by reducing such severance?
	Response by SZC Co. at Deadline 2	SZC Co. recognises through engagement with the Tourism Working Group and from the results of the Ipsos MORI Suffolk Coast Visitors Survey (**Volume 2, Appendix 9F** of the **ES** [APP-196]) that traffic congestion is a key sensitivity to existing and potential visitors. The result of an increase in rail and seaborne freight is a decrease in the proportion of materials being transported by road (HGV) and therefore traffic flows and any severance effects would decrease in absolute terms. Therefore, while an increase in rail or seaborne freight would not change the socio-economic assessment as set out in **Volume 2, Chapter 9** of the **ES** [APP-195]**,** this would result in one of the key sensitivities of potential visitors to tourism being ameliorated to an extent.
	Response by East Suffolk Council at Deadline 2	An increase in rail and sea freight would be of benefit to local communities and the economy, by reducing congestion on the roads, especially at peak times for tourism and the agriculture-based businesses in the locality. However, the benefit is difficult to quantify until construction begins, as throughout a project of this size and scale, unexpected and unplanned loads may need to travel by road that are not suitable for rail or sea – and this will have a negative effect on communities and tourism. Until plans are clearer as to exactly what will travel by rail and sea, it will remain impossible to say whether there will be any economic benefit or whether tourism will be less affected. Even small changes and congestion will affect perceptions of tourism, as messages about it are uncontrolled and people will decide not to visit based on their own experiences of congestion.
	Response by Suffolk County Council at Deadline 2	The LIR (para 24.12) [REP1-045] refers to economic congestion as a negative impact of the construction period, arising from the increase in road traffic in particular of HGVs, buses, AILs and abnormal loads. It states that the transport modelling indicates notable disruption for businesses operating time-dependent activity across the A12. This is further indicated by an assessment of the economic impacts of congestion commissioned by SCC, which is provided in SCC Appendix to ExQ SE.1.42.

ExQ1	Question to:	Question:
		The LIR also refers to increased journey times, increased congestion and reduced reliability on the routes affected by construction traffic (principally any journey that involved part of the A12 north of Seven Hills interchange) that may cause a perception amongst businesses and investors that the area is an inconvenient location for travel and businesses, and may result in considerations to relocate away from the district or development area as they are incurring significant costs from delays. SCC considers that an increase in road congestion may also have an impact on visitor perception which may impact the tourism sector. Even small changes and congestion will affect perceptions of tourism, as messages about it through social media are uncontrolled and people will decide not to visit based on their own experiences of congestion. The LIR also refers to the severance impact of increased road traffic on a number of communities, particularly along the A12, but also on other rural roads. SCC considers that an increase in rail and seaborne freight would reduce the impact of congestion on the highway network. If this increase was significant enough, SCC considers that the economic cost of congestion, as well as the severance impact on local communities, could be reduced. In accordance with mitigation hierarchies, SCC considers that the impacts from road traffic should first be avoided and reduced; therefore an increase in rail and seaborne freight should be a priority. However, SCC considers that there would be residual economic impacts of congestion on the local economy. The high level assessment of the economic impacts of congestion as a result of construction traffic commissioned by SCC (see SCC Appendix to ExQ SE.1.42) indicates that for the A12 corridor between Seven Hills and A1152 Woods Lane there would be a significant negative cost to the economy as a result of congestion along this corridor during construction, and gives a range of the economic impacts based on the high level assessment method. As well as the calculated impacts, it is noteworthy that these calculations do not include any assessment as a result of disruption caused by traffic management as a result of highway works nor as a result of abnormal loads. The LIR ([REP1-045] para 24.26) suggests that consideration should be given to a fund to mitigate/compensate for economic cost of congestion. This would be in addition to measures to mitigate tourism impacts through the proposed Tourism Fund.
	Response by SZC Co. at Deadline 3	The Council's response states that SCC Appendix to **ExQ SE.1.42** (Economic Assessment) indicates that *'for the A12 corridor between Seven Hills and A1152 Woods Lane there would be a significant negative cost to the economy as a result of congestion along this*

ExQ1	Question to:	Question:
		corridor during construction' and that *'consideration should be given to a fund to mitigate/compensate for economic cost of congestion'* (in addition to the measures to mitigate tourism impacts through the proposed Tourism Fund). The Economic Assessment referred to is a user benefit assessment; this assesses the value of time lost or gained as a result of interventions (such as increase in demand on the road network or changes to infrastructure). The report does not conclude a *'significant negative cost to the economy'*. The assessment is not of local economic cost – it could, for example, include a journey through the area that does not stop. The Economic Assessment does not calculate the effect on the specific locations, businesses or sectors. The Economic Assessment itself does not conclude that mitigation is needed in the form of a fund. It concludes the *'there should be some consideration into what mitigation measures could be adopted to reduce the potential delay along the A12'*. This seems to suggest a transport mitigation – not a financial one – and SZC Co. is satisfied that the suite of transport mitigation to be secured within the DCO and Deed of Obligation, with associated management plans, is proportionate and reasonable to reduce the significance of any effect. It is not clear in respect of whom or how the fund proposed would mitigate against the cost of delay. There are a number of issues with the transport user assessment which means the effect of the Sizewell C traffic is overestimated: • The report itself states that the models *'do not display a suitable level of convergence for economic assessment'* (Section 3.3). It is therefore unsuitable to use the models to estimate the economic effect (in this case the transport user (dis)benefits). • There are a number of assumptions and limitations set out in the report that mean that the disbenefit of the Sizewell C traffic is likely to be overestimated. • In particular, the two park and ride sites are excluded from the modelling of the proposed infrastructure; this reduces the benefit associated with the proposed infrastructure. This is particularly true in the early years since the park and ride sites will come forward in 2024 (and therefore the assessment overestimates the implied net effect of the Sizewell C traffic). • Further, it has been assumed that there will be 1,000 two-way HGVs per construction day between 2028 and 2034. However, the preferred freight strategy is forecast to generate 500 two-way HGVs on a typical day during the peak construction phase and

ExQ1	Question to:	Question:
		up to 700 two-way HGVs on the busiest day. **Plate 4.2** of the **Freight Management Strategy** [AS-280] provided a HGV profile over the construction phase based on the preferred freight strategy (i.e. 4 trains per day and temporary BLF). An updated HGV profile of the construction phase was provided in response to ExQ1 question **TT.1.16** [REP2-100] and shows that the level of HGVs per day is far less than the 1000 two-way HGVs assessed in the Economic Assessment. In conclusion, the effect of Sizewell C on the local transport network is overestimated in the Economic Assessment, and in any case, the Economic Assessment is not an appropriate basis for any fund.
	Response by Woodbridge Town Council at Deadline 3	Part of SCC's response at Deadline 2 is that even with increased use of rail and sea freight, the council "considers that there would be residual economic impacts of congestion on the local economy. The high level assessment of the economic impacts of congestion as a result of construction traffic commissioned by SCC (see SCC Appendix to ExQ SE.1.42) indicates that for the A12 corridor between Seven Hills and A1152 Woods Lane there would be a significant negative cost to the economy as a result of congestion along this corridor during construction, and gives a range of the economic impacts based on the high level assessment method. As well as the calculated impacts, it is noteworthy that these calculations do not include any assessment as a result of disruption caused by traffic management as a result of highway works nor as a result of abnormal loads. The LIR ([REP1-045] para 24.26) suggests that consideration should be given to a fund to mitigate/compensate for economic cost of congestion. This would be in addition to measures to mitigate tourism impacts through the proposed Tourism Fund." WTC agrees with this assessment, and further comments that although getting HGVs off the road would reduce the harm done to Woodbridge's economy (and also that of the wider area), the best economic benefit would be gained by cancelling the Sizewell C project - and so avoiding these transport problems altogether.
	Response by SZC Co. at Deadline 5	Refer to SZC Co.'s **Written Submissions Responding to Actions Arising from ISH3** (Doc Ref. 9.50) for a response on SCC's assessment of the economic impact on congestion.
SE.1.43	The Applicant, 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]

ExQ1	Question to:	Question:
		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?
	Response by SZC Co. at Deadline 2	<u>Response to (i)</u> 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. <u>Response to (ii)</u> 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 on 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 Sizewell C Project.

ExQ1	Question to:	Question:
		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. <u>Response to (iii)</u> Only those interventions which would be required to deliver Sizewell Co.'s freight strategy have been considered.
	Response by Network Rail at Deadline 2	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 [above]. Dualling the Lowestoft to Ipswich line was not considered a feasible option iii No

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by Suffolk County Council at Deadline 3	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.
	Response by Woodbridge Town Council at Deadline 3	NWR response to (ii) ... Dualling the Lowestoft to Ipswich line was not considered a feasible option. WTC comment. We understand that this is because the Applicant does not wish to wait until the improvement is done before running the trains. We don't consider this an acceptable approach, as it places project timescales above people's health and wellbeing and before the local economy – in the council area and also more widely.
	Response by SZC Co. at Deadline 5	Please see SZC Co.'s response to NV.1.90.
Chapter 24 TT.1 Traffic and Transport		
TT.1.1	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?
	Response by SZC Co. at Deadline 2	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

ExQ1	Question to:	Question:
		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.
	Response by Suffolk County Council at Deadline 3	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?
	Response by SZC Co. at Deadline 5	SZC Co.'s submission further to ISH2 sets out the position (Doc Ref. 9.42). The seasonal use of the BLF has been factored into estimates of rail usage, whilst the HGV limits are just that; limits. The material demand in the early years, prior to the completion of the marine infrastructure, is driven by the site establishment and enabling works activities, these primarily require capping and asphalt to form the new access roads and platforms; and concrete for the construction of the diaphragm wall and smaller elements. These stages of construction are well understood and enable a robust assessment of the material quantities. The Project HGV profile makes allowance for the requirement to import some of these material volumes by road prior to the rail infrastructure LEEIE (ACA) rail head and later the Green Rail Route (GRR) and TCA sidings, as demanded by the programme. Following the availability of rail, this becomes the primary mode of

ExQ1	Question to:	Question:
		import for these bulk materials. Initially 2 train per day (tpd) via the ACA rail head and then 4 tpd provide reductions in the daily HGVs of 92 and 184 respectively, these reductions can be seen in the HGV profile with a reduced number of road movements generally in year 2 following the commissioning of the rail. The marine import is targeted at further increasing the bulk import capacity for the main earthworks and backfill phase of the project, which is not until year 3 and therefore provides sufficient programme duration for the completion of this infrastructure. The current modelling for the import of marine materials has been conservatively assessed as noted in TT.1.10 with allowance for disruption of supply due to weather or breakdowns etc. It is anticipated that after the first marine import season a greater degree of confidence in its operability may allow for an increase in its forecast use. This conservative approach would allow a reduction of the rail imported volumes rather than a need to increase them. The project is committed to delivery to project with the HGV limits stated, the 4 trains per day 5 to 6 day per week is the maximum the rail can accommodate due to other wider network restrictions and will therefore not exceed these train movements.
TT.1.2	The Applicant	**Marine Freight Quantities** Table 2.1 [AS-280]. Indicate where the following are accounted for: (i) All Abnormal Indivisible Loads (AIL) arriving at the BLF and by road; and (ii) The permanent Hard Coastal Defence Feature (HCDF) rock armour said to be directly deposited by barges on the beach in paragraph 3.4.103 [AS-202]
	Response by SZC Co. at Deadline 2	(i) Table 2.1 of the **Freight Management Strategy** [AS-280] does not include the Abnormal Indivisible Loads (AILs) arriving either via the Beach Landing Facility or by road. **Table 2.1** only summarises bulk material quantities. AILs are classified as equipment rather than bulk material quantities. Further details with regards to the forecast number of AILs via the BLF and road are provided in response to question **TT.1.8** of this chapter.

ExQ1	Question to:	Question:
		(ii) The permanent Hard Coastal Defence Feature (HCDF) rock armour is included in 'other' within **Table 2.1** of the **Freight Management Strategy** [AS-280].
	Response by Suffolk Constabulary at Deadline 3	Please refer to Suffolk Constabulary's comments on the responses to TT.1.8
	Response by SZC Co. at Deadline 5	Please refer to the response by SZC Co. at Deadline 5 to TT.1.8.
TT.1.3	The Applicant, 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: (iii) Explain what GRIP stage proposals are currently at; and (iv) Set out the delivery timescale for the necessary improvement works.
	Response by SZC Co. at Deadline 2	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.

ExQ1	Question to:	Question:
		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 pre-application 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.
	Response by Network Rail at Deadline 2	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's designers has produced. Current status remains at GRIP 2. ii SZC have provided an indicative timetable in response to question G.1.51

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by Together Against Sizewell C at Deadline 3	It would seem that only two options were examined namely: 1. Operate freight trains overnight outside the operating times of passenger trains. 2. Operate freight trains during the day requiring extensive alterations to level crossings to permit freight trains to run at higher speeds than currently obtained. The higher speeds being necessary so as not to impact the current passenger service. It would seem that a third option was not considered i.e. "Operate up to 5 tpd using both day and night time operation whilst accepting the current freight train speed restrictions". This would require a passing loop at Wickham Market but would have provided 5 reliable round train paths per day. Why was this option not considered, particularly as the benefits of a loop at Wickham Market were identified ten years ago?
	Response by Suffolk County Council at Deadline 3	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.
	Response by SZC Co. at Deadline 5	SZC Co. does not propose to add to its answers given at Deadline 2, which (together with the Initial Statement of Common Ground with Network Rail [REP2-074]) remain valid.
TT.1.4	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
	Response by SZC Co. at Deadline 2	The Suffolk County Council's report (entitled Sizewell C DCO application, Rail Proposals, 17 September 2020 by SCC, Aecom and Cadenza Transport Consulting)[11] does not include

[11] Suffolk County Council (2020) Sizewell C DCO application: Rail Proposals.

<table>
<tr><th>ExQ1</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td></td><td>a defined list of issues to respond to. However, a summary of the key issues and responses is provided in the table below.
<table>
<tr><th>Issue</th><th>Response</th></tr>
<tr><td>Why was the possibility of operating 5 trains during the day not pursued further (timetable operations, level crossing alterations)</td><td>The detailed timeline for why this option was discounted is detailed in the Statement of Common Ground with Network Rail (Doc. Ref. 9.10.10).

Please see the answer to AI.1.14, which explains that there is insufficient rail capacity available on the East Suffolk line during the day to provide more than one rail path, and that upgrades to increase capacity are not deliverable within the timescales required.

In particular, the option of 5 trains during the day was primarily discounted due to the volume of level crossing upgrades which would be required based on Network Rail’s assessment of the increased risk of operating freight trains at 40mph during the day.

Network Rail’s response to the Stage 3 consultation in 2019 stated: “as noted in the consultation documents Network Rail has identified a number of risks to the rail-led solution that could potentially impact the programme in terms of the submission date for the DCO. Therefore, EDF and Network Rail recognise that this could affect their decision as to which strategy to pursue. We continue to work closely with EDF to understand the necessary timescales and impact on the programme.”

Key to SZC Co.’s freight management strategy was to ensure it would be deliverable. Both Network Rail, and Aecom’s assessment (para 2.3) identify the delivery risks of such a large programme of level crossing upgrades. This risk was considered unacceptable by SZC Co., and could lead to greater environmental impacts (in the situation that the 5tpd solution would not be delivered in time for the peak years of construction and the required highways mitigations for higher HGV numbers would not have been in the project’s scope).</td></tr>
<tr><td>Programme constraints and delivery risk of the major programme</td><td>As Network Rail are the asset owner, maintainer and operator of the East Suffolk line, the usual process would be for them to undertake upgrades to their own assets, and that Network Rail resource constraints, outside of the control of SZC Co. could impact on the delivery of the works. Section 4.1 of the Aecom report identifies that this would be a risk to delivering a large programme of level crossing upgrades.</td></tr>
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ExQ1	Question to:	Question:
		of works (e.g. length of time to agree BSA and BAPA) — The liability for managing level crossing risk sits with Network Rail as the asset owner. Taking into account the finite level crossing resource within Network Rail, and the relatively small safety benefits the upgrades would provide, it would be in Network Rail's interests (and accounting for their role as a taxpayer funded organisation) to deploy their specialist level crossing resource to projects which would deliver a greater safety benefit. As an example section 2.3 of the Aecom report details that only Network Rail can complete ALCRM reports, and this could take 6 months or more to complete and has become a critical path issue on other projects. Section 4.3 of the Aecom report also identifies the complexity of the legal agreements required to facilitate work on the rail network, along with the protracted timescales for putting these in place.

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.

Proposal	Current status
Run all five freight trains at night	Operational modelling indicates this is not possible without causing disruption to the passenger timetable.
Run longer trains	SZC Co. intends to operate trains up to the permitted train length on the East Suffolk line, which is 339m. It is understood that this due to the existing infrastructure constraints on the route.
Run trains night and day	It is intended to utilise the existing morning nuclear flask path which provides enough time to run a freight train. This is included in [AS-266].

ExQ1	Question to:	Question:
		<table><tr><td>Run trains at weekends</td><td>Network Rail undertake maintenance of the East Suffolk line overnight, when SZC Co.'s trains are planned to operate. To balance the need for maintenance access, with the requirement to maximise the use of rail freight, Sizewell Co. propose to operate trains up to six days per week, further to discussions with Network Rail.</td></tr><tr><td>Recast passenger timetable</td><td>Greater Anglia's responded to the change consultation and stated: *"In principle, we are supportive of rail freight playing a significant role in the construction programme. However, we are opposed to any detrimental impact on the passenger services on the line. As a direct consequence of introducing an hourly service on the line we have generated an increase in passenger journeys of over 100%. With new trains now in place, we have the opportunity to grow patronage further in a manner that not only meets local community, social, tourism and economic needs, but also supports wider decarbonisation targets.* Operating a fifth daily freight train to the main development site would only be necessary for 1-2 years at the peak of construction. There would be a direct impact on the passenger timetable if this was progressed which would require further discussions with Greater Anglia. SZC Co. is not progressing the option of a fifth train at this time.</td></tr></table> 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.
	Response by Suffolk County Council at Deadline 3	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

ExQ1	Question to:	Question:
		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.
	Response by SZC Co. at Deadline 5	SZC Co.'s position on these matters was set out at Deadline 2 and in its **Comments on Written Representations** (Chapter 17) [REP3-042].
TT.1.5	The Applicant, 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.
	Response by SZC Co. at Deadline 2	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. (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.

ExQ1	Question to:	Question:
	Response by Network Rail at Deadline 2	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
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by Together Against Sizewell C at Deadline 3	Please confirm that the earliest the 2tpd service to LEEIE will commence is January 2024. The applicant's previous submission of November/December 2020 envisages that the services will be "parked" on the branch overnight before proceeding to LEEIE for unloading during the day. The current Network Rail Sectional Appendix shows the mode of signalling on the Sizewell Branch to be OTS i.e. One Train Working where a staff is provided. "Staff" in this context means a physical object which is handed to the driver of a train giving him permission to occupy the single line to Sizewell. In the case of the Sizewell Branch the train staff is "divisible" and permits a maximum of three trains on the branch simultaneously but currently a second or third train cannot proceed until the first or second, as appropriate, has been confirmed to have arrived complete at Sizewell Sidings. This method could be adapted substituting LEEIE for Sizewell Sidings but it is not appropriate to a situation where two trains are required to be in the Staff (Token) section simultaneously. What modification to the mode of signalling is proposed to allow two trains to occupy the Sizewell Branch Staff (Token) section simultaneously? Where exactly on the branch will the trains be "parked" overnight and whilst "parked" will the locomotives' engines be shut down?
	Response by Suffolk County Council at Deadline 3	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.

ExQ1	Question to:	Question:
		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.
	Response by SZC Co. at Deadline 5	Good progress has been made with Network Rail on matters related to level crossings and this will be reported in an updated Statement of Common Ground. The issues raised by TASC are being addressed through the upgrades to the branch line and its interface at Saxmundham with the East Suffolk Line.
TT.1.7	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.
	Response by SZC Co. at Deadline 2	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.

ExQ1	Question to:	Question:
		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 [AS-307] 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.
	Response by Together Against Sizewell C at Deadline 3	The applicant's response suggests that two types of wagon are being considered for aggregate train use, namely types JNA and HOA. Please describe the method of unloading these wagons and the noise and dust effects of the chosen method of unloading. Please also indicate the typical time to unload 1,256 tons of aggregate from a train. Assuming that a loaded train is 1,720 tons including locomotive and wagons please state the distance required to bring a train to a stand from 25 mph in the following circumstances: • On a level track. • On a 2.5% falling gradient (1 in 400) • On a 5% falling gradient (1 in 200) • On a 10% falling gradient (1 in 100) • On a 15% falling gradient (1 in 67)

ExQ1	Question to:	Question:
		Assuming that the maximum length of a train is in the region of 339m how will the freight train timetable be constructed to minimise the time that the following level crossings are blocked by a train: 1. Jetty Avenue at Woodbridge when a down train is held at signal ES2011. 2. Ferry and Haywards crossings at Woodbridge when an up train is held at signal ES2004. 3. Chantry Road and Albion St crossings at Saxmundham when a down train is held at signal ES2033. As it seems that a proportion of the aggregates will come from Mendip quarries, what proportion of the route from the Mendips to Sizewell is electrified and what steps will be taken to minimise the use of diesel locomotives on these services? It would seem that the Applicant has decided not to proceed with a 5tpd option. In the two years of maximum activity what does this mean in additional HGV journeys to compensate for the loss of the fifth train?
	Response by Suffolk County Council at Deadline 3	SCC seeks confirmation whether weight restrictions on rail bridges have been considered.
	Response by SZC Co. at Deadline 5	These matters will be recorded in an updated Statement of Common Ground with Network Rail.
TT.1.8	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: (v) By road each year and in total; and (vi) By sea each year and in total.
	Response by SZC Co. at Deadline 2	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).

ExQ1	Question to:	Question:
		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 two-way 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.

ExQ1	Question to:	Question:
		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.
	Response by Suffolk Constabulary at Deadline 3	The Applicant and Suffolk Constabulary have been in discussions regarding the quantum and frequency of AILs travelling to and from the SZC project. The Applicant has based its assessment on data derived from the Delivery Management Systems for HPC. Suffolk Constabulary has provided feedback on the apparent deficiencies in that data but has now reached an agreement about which data are reliable and which are not robust. The assessment of Suffolk Constabulary's resources required to manage those AIL movements and when those resources would be deployed is close to agreement between Suffolk Constabulary and the Applicant based on the HPC data, and reported by the Applicant as a worst case scenario, deliveries made to the BLF would reduce that demand. The Applicant does not state whether permanent AILS are expected to be delivered between October-April, when the BLF is stated to not be available or for periods between April and October when the BLF is not available due to unforeseen circumstances. While Suffolk Constabulary welcomes the BLF facility, no timeline has yet been given as to when the BLF will come online. If this is delayed, it is likely to require large AILs to be moved by road which will draw heavily on Suffolk Constabulary's resource modelling. The Applicant has not set out a process to agree the change of movement of the permanent AILs from the BLF to road. The Applicant is therefore cognisant that Suffolk Constabulary will derive its resources on that basis and that if the demand exceeds that requirement then standard resourcing protocols will be employed by Suffolk Constabulary, where AILs are managed on a business as-usual basis with other hauliers. The Applicant has not currently committed to funding additional resources for Suffolk Constabulary associated with AIL management and other Roads Policing duties. The use of averaged numbered for movements is helpful, in this case the HPC data shows such variation between years that the use of averages is not a reliable mechanism for Suffolk Constabulary's resource planning. The data for HPC indicates significant variances

ExQ1	Question to:	Question:
		in AIL movements and the Applicant has committed to seek to flatten the profile to allow better management and reduce the impacts on the network and resources. It has already been stressed to the Applicant, and clearly articulated through the Written Representation (REP2-168), that Suffolk Constabulary does not have baseline resources dedicated to the movement of AILs. It is imperative that the Applicant's figures regarding the likely movements of AILs are accurate and consider the tolerances that the SZC programme can absorb if there is an increase in AIL numbers, as the solution being proposed by Suffolk Constabulary to facilitate the movements of AILs for the build of SZC will be predicated on the Applicant's data. Further to the quantum of AILs predicted by the Applicant, its Freight Management strategy does not include AILs. Suffolk Constabulary has been informed by the Applicant that AILs will not be directed via the FMF. This will impact on Suffolk Constabulary's ability to conduct early compliance checks with SZC AILs prior to escorting those loads to the Main Development Site. The Applicant should set out how those compliance checks will be carried out by Suffolk Constabulary in a safe environment.
	Response by Suffolk County Council at Deadline 3	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.
	Response by SZC Co. at Deadline 5	SZC Co. agrees with Suffolk Constabulary that good progress has been made on the proposed management of AILs and required police resource. The proposed timing of the delivery of the permanent BLF is set out in the **Implementation Plan** [REP2-044]. The permanent AILs are scheduled to be delivered once the permanent BLF is operational and will be programmed to be delivered when the BLF is available for use (i.e. between April and October).

ExQ1	Question to:	Question:
		Through discussions with Suffolk Constabulary, it has been agreed in principle that SZC Co. will fund a dedicated AIL police escort resource for the Project, the details of which are in the process of being agreed. SZC Co. has committed to seek to smooth the profile of road based AIL deliveries where possible, which will be incorporated into the next draft of the **Construction Traffic Management Plan** (**CTMP**) [REP2-054]. It is understood and accepted by SZC Co. that Suffolk Constabulary would employ standard AIL resourcing protocols for any police escort AIL requirements beyond the daily dedicated police escort resource, in the same way as for any other non-Sizewell C AIL deliveries. AILs are not proposed to route via the freight management facility. Currently AILs requiring police escort along the A12 are met by the police at Orwell lorry park and this existing facility is proposed to be used for the Sizewell C AILs. However, the majority of the road based AILs are not expected to require police escort for the entire route from Orwell lorry park to the main development site. As such, SZC Co. is in the process of agreeing location or locations on the proposed HGV routes for the police to undertake AIL compliance checks and to meet the AILs for onward police escort to the main development site. This process will be included in the next draft of the **CTMP** [REP2-054]. SZC Co. has committed to adhere to Highways England's water preferred policy, which will be monitored both by Highways England as part of the statutory AIL notification process as well as the TRG monitoring process set out in the **CTMP** [REP2-054]. The water preferred policy seeks to remove the heaviest / largest AILs from the highway network in order to minimise the impact on the highway network. The majority of the road based AILs are smaller in size and, as such, would have less impact on the highway network. Both the Sizewell link road and two village bypass will bypass Farnham bend and B1122, which will also minimise the impact of AILs. The proposed management of AILs is set out in the **CTMP** [REP2-054] and further detail is to be provided in the next version based on discussions with stakeholders.
TT.1.9	The Applicant	**Permanent BLF – Usage**

ExQ1	Question to:	Question:
		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.
	Response by SZC Co. at Deadline 2	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 off-loading 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.
	Response by Suffolk County Council at Deadline 3	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.
	Response by SZC Co. at Deadline 5	SZC Co. has produced a note for Deadline 5 on Materials Import and Modal Split (Doc Ref. 9.49) which addresses these issues in detail. For the reasons explained there, no greater commitment can be given to precise modal split between the three principal transport modes beyond the implications of the HGV limits which ensure that no more than 40% of materials are moved by HGV, although opportunities will be monitored and may arise for greater marine capacity. Notwithstanding this, SZC Co. has already

ExQ1	Question to:	Question:
		committed to adhere to Highways England's water preferred policy, which will be monitored both by Highways England as part of the statutory AIL notification process as well as the TRG monitoring process set out in the **CTMP** [REP2-054].
TT.1.10	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.
	Response by SZC Co. at Deadline 2	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:**

ExQ1	Question to:	Question:
		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.
	Response by Suffolk County Council at Deadline 3	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.
	Response by SZC Co. at Deadline 5	During the marine season, April to October, there will be approximately 213 days of potential operation for the temporary BLF. On the basis of a 12.4 hr tidal cycle, 412 high tides (rounded to 400) will allow suitable depth of water for vessels to sail to and berth at the facility. Historic wave buoy data has been analysed to predict the proportion of time that the wave heights and swell will be too great to

ExQ1	Question to:	Question:
		allow the safe berthing and discharge of a vessel, a proportion of just over 10% has been used in the assessment. An additional 20% for downtime has been allowed to cover other disruptions to the marine import such as breakdowns, port and navigation issues and other unforeseen problems. The result is that an estimated 355 suitable tidal and weather windows will be available for marine import providing a theoretical import capacity per campaign of 1.275M t. The extent to which the capacity can be used or relied upon is explained in the Deadline 5 submitted document on Materials Import and Modal Split (Doc Ref. 9.49).
TT.1.11	The 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: (vii) 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 (viii) The theoretical HGV capacity by year and in total using the suggested limits in paragraph 4.1.12.
	Response by SZC Co. at Deadline 2	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

ExQ1	Question to:	Question:
		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]

ExQ1	Question to:	Question:
		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].
	Response by Suffolk County Council at Deadline 3	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 not be available in the early years.
	Response by SZC Co. at Deadline 5	While the theoretical capacity of 14.46Mt by road would appear sufficient to deliver the 12.1M t of material requirement it must be understood that this would only be achieved by consistently using the maximum HGV movements everyday

ExQ1	Question to:	Question:
		throughout the project. The material demands are not evenly distributed over the project duration and therefore the assumption that the road import could solely meet the demands of the project is incorrect. The bulk materials demand is heavily focused in the first 5 years with high quantities of backfill import in years 3 and 4 and concrete production commencing and overlapping in years 4 and 5. The road capacity would not be sufficient to import the quantities required over this period and the project. Additionally, the basis of the calculation and the assumption that every HGV has a capacity of 18.5t risks exaggerating the capacity by road. As SZC Co. has explained, the HGV classification covers all vehicles down to 3.5t GVW. In additional there are other HGV movements which are not associated with the import of construction material which will be required during the project lifecycle. The delivery of construction plant and equipment which is transported by road is excluded from the 12.1M t demand. The materials for the associated developments that do not route along the B1122 are not included in the HGV profile as these deliveries do not enter the main development site or travel along the B1122 through the villages of Theberton and Middleton Moor and instead are distributed along the A12 corridor. The HGV deliveries for these elements of the work have been assessed and modelled separately. The statement requiring an Early Year bias should have read 'In the 'Early Years' (Years 1 and 2) there will be a bias towards bulk materials import by rail following the infrastructure becoming available. Following this, bulk materials will predominantly by imported by rail, and later by marine, the typical payload of the HGVs will drop as the typical HGV moves from bulk material import to other smaller consumable type materials. This has been taken into account in the HGV profile at **Plate 4.2** of the **Freight Management Strategy** [AS-280].

ExQ1	Question to:	Question:
		Further information is provided, including a breakdown of HGV movements by size in the Deadline 5 document on Materials Import and Modal Split (Doc Ref. 9.49).
TT.1.12	The 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?
	Response by SZC Co. at Deadline 2	**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.
	Response by Suffolk County Council at Deadline 3	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.
	Response by SZC Co. at Deadline 5	Data from Hinkley Point C is a useful reference as it allows a basis for comparison against the Sizewell C proposed strategy however the two projects have very different enabling works requirements and materials import facilities. The ability to import by rail directly onto the project site in addition to marine also allows a greater proportion of material to be diverted off the road and therefore a direct comparison with Hinkley Point C would not be accurate. The document on Materials Import and Modal Split submitted at Deadline 5 (Doc Ref. 9.49) provides further detail on the HGV profile over the construction stage.

ExQ1	Question to:	Question:
TT.1.14	The 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: (ix) Do the figures in Table 2.1 include all the Associated Development site material requirements; and (x) Provide a breakdown of the quantities of materials for the main development site (xi) and for each of the associated development sites
	Response by SZC Co. at Deadline 2	(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]
	Response by Suffolk County Council at Deadline 3	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

ExQ1	Question to:	Question:
		Bitumen 80000 Aggregate 70000 Steel 600 Other 100 Total 151900 No. of HGVs (18.5t): 16422
	Response by SZC Co. at Deadline 5	As noted in TT.1.11 the assumption of a typical HGV capacity of 18.5t if used as an average may underestimate the number of HGV movements. For instance, concrete will be delivered in 6 cubic meter / 14t wagons, whilst other materials will be delivered in 'HGV' vehicles as small as 3.5t. The document on Materials and Modal Split (Doc Ref. 9.49) shows the likely breakdown.
TT.1.15	The Applicant	**HGV Associated Development Sites** The limits set out in the CTMP [APP-608] refer to HGV movements to the main development site. Provide: (xii) The number of HGV movements by year to the associated development sites; and (xiii) The yearly and total quantity of materials transported by HGV for the associated developments sites.
	Response by SZC Co. at Deadline 2	(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:

<table>
<tr><th>ExQ1</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td></td><td>- 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.</td></tr>
<tr><td></td><td>Response by Suffolk County Council at Deadline 3</td><td>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:
<table>
<tr><th>AD Site</th><th>CTMP Daily Average HGV movements</th><th>TT.1.15 Peak Year movements</th><th>TT.1.15 Average Daily Movements (based on 313 days)</th><th>TT.1.15 Average Daily Movements (based on 261 days)</th></tr>
<tr><td>Two Village Bypass</td><td>120</td><td>5,538</td><td>18</td><td>21</td></tr>
<tr><td>Sizewell Link Road</td><td>200</td><td>19,519</td><td>62</td><td>75</td></tr>
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</td></tr>
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<table>
<tr><th>ExQ1</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>A12 / B1122 roundabout</td><td>20</td><td>1,548</td><td>5</td><td>6</td></tr>
<tr><td>Northern Park and Ride</td><td>42</td><td>3,068</td><td>10</td><td>12</td></tr>
<tr><td>Southern Park and Ride</td><td>42</td><td>3,040</td><td>10</td><td>12</td></tr>
<tr><td>FMF</td><td>42</td><td>3,262</td><td>10</td><td>13</td></tr>
</table>
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.
</td></tr>
<tr><td></td><td>Response by SZC Co. at Deadline 5</td><td>As noted in TT.1.11 the distribution of materials over the construction of a project is not linear and therefore an assessment of average movement requirements over the total construction period cannot be undertaken. The early earthworks phase and latter surfacing phase of the highway schemes demand much greater HGV imports than outside of these periods. During these discrete operations the daily HGV movements will be aligned with the figure stated in the CTMP.</td></tr>
<tr><td>TT.1.16</td><td>The Applicant</td><td>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.</td></tr>
<tr><td></td><td>Response by SZC Co. at Deadline 2</td><td>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]</td></tr>
</table>

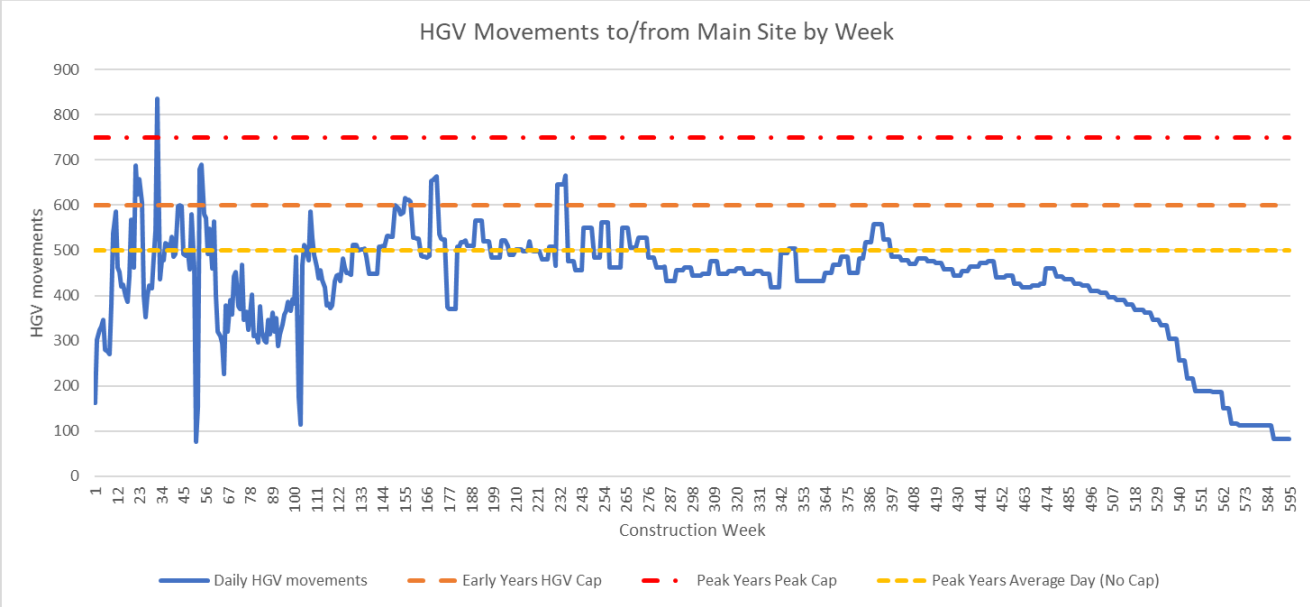
ExQ1	Question to:	Question:
		the updated histogram includes all HGV movements for construction within the main development site, including: site establishment and enabling works within the main construction area, temporary construction area and LEEIE, Sizewell B relocated facilities, green rail route 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.
	Response by Suffolk County Council at Deadline 3	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

ExQ1	Question to:	Question:
		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.

ExQ1	Question to:	Question:
		 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".
	Response by SZC Co. at Deadline 5	The HGV profile is for the preferred freight management strategy and therefore reference to 'minimum HGV numbers over the construction period' is only reference to the fact that the integrated freight strategy would result in more HGVs. However, SZC Co. is confident that the preferred freight strategy is deliverable and this is the basis of the proposed HGV limits. Therefore, the HGV profile sets out the forecast HGV movements and not the minimum number of HGVs for the preferred freight strategy. The early years HGV daily limit of 600 two-way HGV movements/day includes all Sizewell C HGVs that route along the B1122 through Middleton Moor and Theberton and therefore HGV movements associated with the construction at the main development site (including LEEIE), the green rail route, improvements to Lover's Lane, Sizewell link road and the

ExQ1	Question to:	Question:
		consented relocated Sizewell B facilities are all included within the 600 daily HGV limit for the early years. It is proposed to have a daily HGV cap of 600 two-way HGV movements on the B1122 in the early years (prior to the delivery of the Sizewell link road and two village bypass) and thereafter for the remainder of the construction phase have a daily HGV cap of 700 two-way HGV movements at the main development site. The material presented in the HGV histogram shows the project estimate of material requirements. It shows how the work will need to be managed to ensure HGV numbers stay within the daily HGV caps of 600 and 700 two-way HGV movements respectively. It would be wrong to conclude that the caps would be breached; they are fully enforceable. Further information on quarterly average caps is set out in the Written Submission for ISH2 (Doc Ref. 9.49).
TT.1.18	The Applicant	**Freight Management Facility – Control of HGV Flows** Table 7.4 of the TA [AS-017], shows the arrival and departure pattern of HGVs at the Main Development Site. The FMF is intended to be in part used to regulate the flow of HGVs to the Main Development Site. Is it intended that HGVs would leave the FMF in convoys or individually?
	Response by SZC Co. at Deadline 2	HGVs will be released from the freight management facility individually rather than in convoy.
	Response by Suffolk Constabulary at Deadline 3	At 570 HGVs arrivals per day at peak and a peak of 71 HGVs in the busiest hour, this is approximately 1 lorry one-two minutes for much of the day, a near constant flow of vehicles leaving the FMF and arriving at the Main Development Site. Whilst this is a matter associated with network capacity and operations for Suffolk County Council (SCC) to consider, Suffolk Constabulary is concerned that poor management at the main site gate line could cause network safety problems. The Applicant has been asked to respond to how this will be mitigated simply through the Delivery Management System and to assure Suffolk Constabulary that safety will not be impeded. For example, will the Main Development Site gate be free flow or will final checks be carried out? Will the Applicant guarantee that there will not be queuing back onto B1122?

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 5	One of the primary roles of the DMS and FMF is to manage the arrival profile of HGVs at the main development site to ensure that there will not be queuing back onto the B1122. Sufficient HGV stacking capacity is also provided at the main development site access road and within the plaza itself in order to ensure that this will not occur.
TT.1.21	The Applicant	**Freight Modal Shares - Revised Freight Management Targets** Provide: (xiv) Explanation of how the revised modal targets for freight management and HGV numbers will be secured within the DCO; (xv) A revised CTMP to reflect the updated Freight Management Strategy?
	Response by SZC Co. at Deadline 2	(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. (ii) An updated **CTMP** (Doc. Ref. 8.7(A)) has been provided.
	Response by Suffolk County Council at Deadline 3	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

ExQ1	Question to:	Question:
		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].
	Response by SZC Co. at Deadline 5	The HGV limits have been set taking account of the scale and nature of the construction materials. It is inherent in this that sustainable modes will be used for c. 60% of construction materials. Further consideration of HGV caps is provided in the **Written Submission for ISH2** (Doc Ref. 9.49).
TT.1.22	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: (xvi) What controls are suggested to ensure target HGV numbers and sizes are limited to those assessed in the application; (xvii) The monitoring process to ensure compliance; (xviii) Remedial actions should HGV numbers exceed any limits set; and (xix) How such controls, monitoring and remedial actions will be secured within the DCO.
	Response by SZC Co. at Deadline 2	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

ExQ1	Question to:	Question:
		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.
	Response by Suffolk County Council at Deadline 3	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".

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 5	SZC Co. has explained the operation of the CTMP at ISH1 and ISH2 and in the subsequent Written Notes (Doc Ref. 9.42 and 9.43). An updated CTMP taking account of comments received will be provided at Deadline 6.
TT.1.23	The Applicant, SCC	**Construction Traffic Management Plan (CTMP) [APP-608], Traffic Incident Management Plan (TIMP) [APP-607], Construction Worker Travel Plan (CWTP)[APP-609] – Transport Review Group** The Transport Review Group membership, structure, roles and responsibilities is explained in the CTMP, the CWTP and the TIMP. The group consists of six members three appointed by SZC and three from other stakeholders. Notwithstanding information in the draft Section 106 [PDB-004], explain how the decisions will be made in this group if there is not a majority vote?
	Response by SZC Co. for Deadline 2	The experience at Hinkley Point C (which has an identical Transport Review Group (TRG) structure in the Section 106 agreement) has been positive. The TRG works collaboratively in order to ensure the efficient construction of the project and the effective mitigation of effects. The parties have common objectives and voting is not necessary. At Sizewell C the engagement over transport issues has been close and constructive and a similar approach to the TRG is anticipated. However, in the event that disputes arise which cannot be resolved within the TRG, the **Deed of Obligation** (Doc. Ref. 8.17(C)) contains clear provisions for governance. Schedule 16 (Transport) provides for disputes to be escalated to the Delivery Steering Group – which is a comparable structure to the governance provisions at Hinkley Point C. To date no issues have arisen at Hinkley Point C which could not be resolved within the governance structure. However, in the event of continuing unresolved disagreement, the dispute resolution provisions set out in section 8 of the **Deed of Obligation** could also be called upon.
	Response by East Suffolk Council at Deadline 2	ESC is proposed as one of the attendees from other stakeholders and we highlight that Highways England as one of the 'other stakeholders' may abstain from votes on roads that do not fall to their control creating an imbalance in the group. ESC suggests that SCC as local highway authority has greater representation on the group to avoid imbalance.

ExQ1	Question to:	Question:
	Response by Suffolk County Council at Deadline 2	The Transport Review Group can in cases of dispute refer these to the Delivery Steering Group for resolution ([PDB-004] Schedule 17) and ultimately Clause 6 of the Deed within the s106 [PDB-004] enables resolution of disputes for example if no majority decision is reached by the TRG members. SCC notes that this process takes time (as yet not defined within the s106) reducing the responsiveness of the group and that Highways England are not party to the s106. While it is accepted that the group would aim to reach consensus in its decision making, and while the arbitration route is seen as appropriate to resolve disputes, SCC proposes for Suffolk County Council (as the local Highway Authority) to chair the group, and that the Chair would have the casting vote. Further work is required to detail procedures and terms of reference to give clarity to the decision-making process to avoid ambiguity that could lead to split or bipartisan decisions. The key will be the independence of the Transport Co-ordinator from the Applicant's delivery team. While appointed by the Applicant, there is no requirement for the postholder to be an employee ([APP-608] section 2.3.1). SCC also proposes a proxy voting arrangement in the group's constitutional arrangements, so that if one of the "other stakeholders" (not appointed by the Applicant) referred to in the question above does not attend a meeting, one of the attendees can vote as a proxy.
	Response by SZC Co. at Deadline 3	**Chapter 2** of the **Construction Traffic Management Plan** (**CTMP**) [REP2-054], **Construction Worker Travel Plan** (**CWTP**) [REP2-055] provides more information on the governance, terms of reference and procedures proposed for the Transport Review Group (TRG). Responding to SCC's points above: 1) Paragraphs 2.3.5 of the **CTMP** [REP2-054] and **CWTP**) [REP2-055] allow SCC, ESC and Highways England to nominate an alternative representative (proxy) from their authority if they are unable to attend. 2) Paragraphs 2.4.3 of the **CTMP** [REP2-054] and **CWTP**) [REP2-055] state that the Transport Coordinator could either be an employee of SZC Co. or an independent consultant but notes that they would need to be independent of the Sizewell C delivery team. 3) The administration and decision-making of the TRG is established within **Section 3.2** of **Schedule 16** to the **draft Deed of Obligation** (Doc Ref. 8.17(D)). It proposes

ExQ1	Question to:	Question:
		that SCC would chair the TRG as proposed by SCC in their Deadline 2 response, but SCC would not have a casting vote. This follows the approach at Hinkley Point C which the Applicant considers has worked well. Please also see SZC Co.'s response to SA.1.59. 4) Should it be required to resolve a situation where no majority can be reached through TRG voting, a dispute resolution procedure will be in place. The dispute resolution procedures are set out in clause 8 of the **draft Deed of Obligation** (Doc Ref. 8.17(D)), as described in SZC Co.'s response to this question at Deadline 2. The dispute resolution process will be time constrained, but acknowledge that timescales are not included in the **draft Deed of Obligation** (Doc Ref. 8.17(D)).
	Response by Suffolk Constabulary at Deadline 3	i. Suffolk Constabulary wishes to be included within the constitution of the Transport Review Group (TRG) to allow fuller and more succinct review and management of Roads Policing aspects of the SZC project. This could include the detailed planning of temporary roads interventions. ii. Suffolk Constabulary wishes to be included within the constitution of the TRG to allow fuller and more succinct review and management of Roads Policing aspects of the SZC project. This could include the detailed planning of temporary roads interventions.
	Response by SZC Co. at Deadline 5	SZC Co. has explained the operation of the CTMP at ISH1 and ISH2 and in the subsequent Written Notes (Doc Ref. 9.42 and 9.43). An updated CTMP taking account of comments received will be provided at Deadline 6. Refer to the Written Submission for ISH 3 (Doc Ref 9.50) for SZC Co. position on the TRG. SZC Co. does not propose to amend the constitution of the TRG to give voting rights to the Suffolk Constabulary. The role of the Police is hugely valued and the Police have a central role to play in the Community Safety Working Group, which will be attended by the Transport Coordinator. SZC Co. is also working with the Police to agree a protocol to address arrangements for joint working and resourcing. It will be a matter for the TRG but SZC Co. would expect that the attendance of the Police would be very welcome at meetings of the TRG where there is no question that its advice on a range of issues would be accorded considerable weight.

ExQ1	Question to:	Question:
		However, the TRG has a wide ranging role, covering the remit of the highway authorities. The TRG is proposed with a deliberately balanced structure and works successfully in that way at Hinkley, where the Police feed into issues but are not full members of the TRG. There is no evidence that approach has created practical difficulties for the Police or other parties.
TT.1.25	The Applicant, SCC	**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?
	Response by SZC Co. at Deadline 2	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

ExQ1	Question to:	Question:
		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

ExQ1	Question to:	Question:
		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)).
	Response by Suffolk County Council at Deadline 2	To ensure that vehicle movements do not exceed those assessed within the environmental statement: I) The Delivery Management System shall be used to record the total HGV movements entering and exiting each Associated Development Site. SCC considers that the simplest way of ensuring that this was the case would be for all HGVs to be required to have GPS, but potentially other satisfactory methods may be feasible. II) As above, GPS should be used to monitor the timing of HGV movements on sensitive links and to restrict peak hour movements to those assessed within the Transport Assessment. However, SCC is mindful that other acceptable methods may be feasible. If possible, monitoring data could include journey times along the HGV route. III) SCC considers that the DMS could be used to monitor the total number and routeing of LGVs; this should be reported to the TRG and may require further investigation through traffic counts or another reasonable method and appropriate mitigation. IV) SCC considers that the TMMS should be used to monitor the routeing of bus movements, including journeys when empty; and this should be reported and monitored by the TRG. However, an alternative monitoring method may be considered reasonable. V) As above, GPS should be used to monitor the routing of HGV movements to those assessed within the Environmental Statement. However, SCC is mindful that other acceptable methods may be feasible. VI) Tracking of HGVs shall enable monitoring and control of journeys at the beginning or end of the working day to control overnight movements and avoid unnecessary disturbance to communities adjacent to the haul routes or antisocial activities associated with overnight stays in laybys. These issues have been raised in the LIR Annex M [REP1-058].

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 3	Refer to SZC Co. response in Chapter 15 (Sections 15.4 and 15.5) **Comments on Councils' Local Impact Report** (Doc Ref. 9.29) with regards to SZC Co. position on the robustness of the transport assessment and need for controls. Further comments are provided below in response to Suffolk County Council's response for Deadline 2: (i) The **CTMP** [REP2-054] proposes to monitor the number of daily HGV movements for each of the associated development sites during its construction through the development management system (DMS). Given the level of HGV movements and duration of associated development site construction, which will be phased in accordance with the **Implementation Plan** [REP2-044] it is not proposed to track associated development site construction HGVs with GPS. (ii) The **CTMP** [REP2-054] includes peak hour (i.e. 08:00-09:00 and 17:00-18:00) HGV limits as well as daily HGV limits for HGV movements to/from the main development site. (iii) The **CTMP** [REP2-054] proposes to monitor the number of LGV movements to/from the main development site but not the routeing for the reasons set out in SZC Co.'s response to this question for Deadline 2 set out above. (iv) The **CWTP** [REP2-055] proposes to monitor the arrival and departure of buses at the main development site. However, it is not proposed to provide the TRG with monitoring data of the routeing of buses as, unlike the HGV drivers, the bus drivers will be regular drivers for the Sizewell C Project and will be driving buses on fixed bus routes to a timetable that will have been approved by the TRG. (v) The **CTMP** [REP2-054] proposes to monitor compliance with the HGV routes to/from the main development site based on GPS technology. (vi) The **CTMP** [REP2-054] proposes to monitor HGV use of laybys on the local highway part of the HGV routes outside of the main development site HGV timing restrictions.
	Response by Suffolk County Council at Deadline 3	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

ExQ1	Question to:	Question:
	Response by Woodbridge Town Council at Deadline 3	SCC's response at Deadline 2 to this question mentions using the Delivery Management System, and tracking vehicle movements by GPS or some other technology. WTC comments that this response shows commendable desire, but has not gone beyond a suggestion that it might be possible to find out where vehicles are at a given time. In our view, and as implied in question TT.1.24 to the Applicant, 'active management' will need more than evidence-gathering; it needs to be extended to actions to prevent harm to the various communities (including Woodbridge), and where the rules are transgressed there should be a disciplinary procedure with proportionate sanctions, including the option to permanently remove individuals or companies from the project for repeated offences. Those charged with 'actively managing' these activities must be accountable for doing this job properly. We understand this may already be working on the Hinkley Point C project, and suggest this be investigated to see what can be learned.
	Response by Stop Sizewell C at Deadline 3	Heavy loads route (referenced in several questions) Highways England heavy loads route 100 runs from Lowestoft along the A12 and includes the B1122. This designation relates to the status of the B1122 during the construction of the A and B stations. However, it is very clearly unsuitable for the proposed development, including before the construction of the proposed SLR. This illustrates the complete inadequacy of the existing East Suffolk transport network for SZC construction activities. The Applicant needs to build a link road in the correct position and if this means bypassing Yoxford for transport coming from the north that is what they need to do.
	Response by SZC Co. at Deadline 5	SZC Co. continues to liaise with the stakeholders on necessary controls and monitoring of SZC related traffic during the construction phase. In addition, as part of the liaison with SCC, SZC Co. is currently addressing comments on **Volume 1, Chapter 2** of the **ES Addendum** [AS-181] and a technical note will be submitted at Deadline 6. The updated assessment includes consideration of the hour of greatest environmental impact such as vulnerable road users travelling to and from school, including Farlingaye High School.
TT.1.28	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:

ExQ1	Question to:	Question:
		(xx) Traffic incidents already covered in the plan; and (xxi) Traffic delays created by movement of abnormal loads and their potential impacts on emergency services responses
	Response by SZC Co. at Deadline 2	(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 <3.5m wide and a small proportion would 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

ExQ1	Question to:	Question:
		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)).
	Response by Suffolk County Council at Deadline 3	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.
	Response by SZC Co. at Deadline 5	Management of AILs across the Darsham and Middleton level crossings was discussed at the ISH2 and is summarised in the Written Notes for ISH2 (Doc Ref 9.42).
TT.1.29	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.
	Response by SZC Co. at Deadline 2	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).

ExQ1	Question to:	Question:
		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.
	Response by Suffolk Constabulary at Deadline 3	Through on-going engagement with Avon and Somerset Police Constabulary, Suffolk Constabulary has been made aware of increased levels of traffic offences which are noted to be associated with the workforce at HPC. Suffolk Constabulary has therefore committed to the Applicant that, should the additional resources within the AIL unit, that would be funded by the Applicant, have residual time, then that time would be used for active and pro-active enforcement and complementary Roads Policing duties.
	Response by Suffolk County Council at Deadline 3	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

ExQ1	Question to:	Question:
		"Comments on any additional information/submissions received by D2" sets out additional controls requested by SCC.
	Response by SZC Co. at Deadline 5	The early years workforce transport strategy was discussed at ISH2 and ISH3 and further detail is set out in SZC Co.'s **Written Submissions Responding to Actions Arising from ISH3** (Doc Ref 9.50).
TT.1.32	The Applicant	**Abnormal Indivisible Loads (AIL)** A number of RR's express concern whether movement of AIL will hinder traffic movement and potential response times for emergency services in the area. Explain: (i) How many AIL movements are expected on a typical day in the early years in advance of the Sizewell Link Road being open; (ii) How traffic movement and emergency service access will be maintained during the early years prior to a suitable alternative route being available; and (iii) How many AIL's movement are expected on a typical day during peak construction and on the busiest days.
	Response by SZC Co. at Deadline 2	The **Construction Traffic Management Plan** (**CTMP**) (Doc Ref 8.7(A)) has been updated to include further information on AIL movements. Please refer to response to Question **TT.1.8** of this chapter, which sets out the two types of AILs. AIL movements by road are expected to be limited to temporary construction AILs. The total number of temporary construction AILs for the whole construction phase is unknown at this stage, however 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)). (i) Data from 2017 for Hinkley Point C is the most accurate forecast of the level of AIL movements by road for the Sizewell C Project during the early years prior to the two-village bypass and Sizewell link road being operational. The data shows that

ExQ1	Question to:	Question:
		there would be circa 2,055 AIL two-way movements to/from the main development site per annum during this phase, with an average of 6 AIL movements per day and a peak of 23 AIL movements in a day. Based on the 2017 data from Hinkley Point C there were 31 loads during the year that were >5m wide and 12 loads during the year that were 4.4m-5m wide. Over 50% of the loads were <3.5m. (ii) Please refer to the response to **TT.1.28** of this chapter for the approach to managing AIL movements by road as well as (i) above, which provides the context of the types of loads expected. Based on discussions with Hinkley Point C, data from 2018-2020 for Hinkley Point C (summarised in the Sizewell C **CTMP** (Doc Ref 8.7(A)) is the most accurate forecast of the level of AIL movements by road for the Sizewell C Project during the peak construction phase once the two-village bypass and Sizewell link road are operational. The data over the three years has been averaged and shows that there would be circa 1,171 AIL two-way movements to/from the main development site per annum during the peak construction phase, with an average of 3 AIL movements per day and a peak of 26 AIL movements in a day. Based on the average of the 2018-2020 data from Hinkley Point C there were an average of 11 loads per year that were >5m wide and 13 loads per year that were 4.4m-5m wide. 91% of the loads were <3.5m.
	Response by Suffolk Constabulary at Deadline 3	Suffolk Constabulary continues to engage with the Applicant on the specific details and controls set out within the outline CTMP, such as the AIL management matrix / matrices. Suffolk Constabulary is not yet able to agree to the outline CTMP as submitted. The Applicant has prepared network modelling to illustrate the effect of the project-based traffic on the A12 corridor, however, that evidence does not consider the impacts of slow and larger AIL movements and especially any residual effects into the peak period on the network following a movement along the corridor. The effects of AIL movements on the network is therefore not demonstrated in evidence before the Examination. In correspondence with Suffolk Constabulary, the Applicant has recognised the low quality of the data from 2017 and it is noted that there is no robust evidence available. As noted elsewhere in these responses, if the Applicant provides funding, Suffolk Constabulary will seek to establish an increased resource for AIL management to the level agreed with the Applicant. If that is insufficient for the Applicant's purposes, then the business-as-usual AIL unit will assist in line with current practice and availability.

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 5	The **Construction Traffic Management Plan** (**CTMP**) [REP2-054] sets out the proposed management of AILs, which includes the delivery of AILs in accordance with the time limits set out in the Norfolk and Suffolk Constabulary AIL guidance (Dec 2016). Therefore, AIL movements will be scheduled outside of the network peak hours. SZC Co. has engaged with Suffolk Constabulary to agree the forecast AIL movements for Sizewell C based on the HPC data. The updated version of the **CTMP** [REP2-054] to be submitted at Deadline 6 will include updated Tables 3.1 and 3.2 based on the discussions with Suffolk Constabulary and analysis of HPC data.
TT.1.33	The Applicant	**Abnormal Indivisible Loads (AIL) – Road Based** Provide details of the likely origin and routes for the road based AIL movements.
	Response by SZC Co. at Deadline 2	Please refer to the response to **TT.1.8** of this chapter for context with regards to permanent equipment AILs and temporary construction AILs. The vast majority of the permanent equipment AILs will originate from Europe. The proposed approach to AILs is for the permanent equipment AILs to be transported by sea via the permanent BLF. SZC Co. will seek to utilise any spare capacity within the permanent BLF to deliver some of the heavier / larger temporary construction AILs by sea, if the programme allows. The temporary construction AILs will primarily originate from the UK from a wide number of sources. • Road based temporary construction AILs that originate from the north of the main development site would route via Highways England Heavy Load Route 100 from Lowestoft via the A12 (north) and the B1122 in the early years and the B1122, Middleton Moor link and Sizewell link road, once operational. Road based temporary construction AILs that originate from the south of the main development site would route via the A12 (south) and the B1122 in the early years and the Sizewell link road once operational.
	Response by Stop Sizewell C at Deadline 3	The vast majority of AILs, all of which will be for permanent structures, will come from Europe. Temporary construction AILs will come from the UK via the A12 and B1122.

ExQ1	Question to:	Question:
		AILs from the south will also use the B1122, using the A12 via tight bends at Yoxford. There will be a dramatic impact on Yoxford and flow of traffic on A12 and the B1122. This illustrates the urgent need for an appropriately located Link Road of the development proceeds.
	Response by Together Against Sizewell C at Deadline 3	The Applicant states that Abnormal Indivisible Loads (AIL) from the north will be routed via Lowestoft via the A12 and then onto the B1122 at Yoxford. This entails crossing Darsham AHBC level crossing. What steps will the applicant take to eliminate the risk of an AIL "grounding" on the level crossing?
	Response by SZC Co. at Deadline 5	Network Rail has advised SZC Co. that the level crossings at Darsham station on the A12 and the B1122 at Middleton do not present any specific concerns as long as standard cautions for crossing are observed by AILs. Management of AILs across the Darsham and Middleton level crossings was discussed at the ISH2 and is summarised in the **Written Notes for ISH2** (Doc Ref 9.42).
TT.1.34	The Applicant, SCC, Scottish Power	**Transport Assessment (TA) [AS-017] – Cumulative Assessment with EA1 and EA2** In the Table 26.2 of Chapter 26 of Environmental Statement (ES) for the East Anglia One North and Two Offshore Windfarm application it is identified that there may be a need for potential structural alterations to the existing bridge on the A12 at Marlesford to facilitate the movement of abnormal load vehicles over this bridge. Has this requirement: (i) Been considered as part of the Sizewell C project? (ii) If this was to be required how would construction work impact on traffic flows on the A12 at Marlesford?
	Response by SZC Co. at Deadline 2	(i) Suffolk County Council (SCC) has confirmed that the highway structures on the A12 between the A14 at Seven Hills and the B1122 have all been approved by SCC for Special Type General Order (STGO) Category 1, 2 and 3 loads and Construction and Use (C&U) loads (i.e. loads below 150 tonnes). It is proposed to provide a permanent beach landing facility (BLF) to deliver the largest/heaviest AILs by sea. Given the existence of the Highways England heavy load route 100, which routes from Lowestoft Port to Sizewell, it is envisaged that any heavy loads not delivered via the permanent BLF would be delivered via the heavy load route. Therefore,

ExQ1	Question to:	Question:
		structural alterations to the bridge on the A12 at Marlesford are not considered to be required for the Sizewell C Project. (ii) As set out in (i), structural alterations to the bridge on the A12 at Marlesford are not considered to be required.
	Response by Scottish Power Renewables at Deadline 2	EA1N&EA2 Applicants' Responses to Written Question 2 Volume 8 2.18 Transportation and Traffic - Version 01, Q2.18.17 (East Anglia TWO examination reference REP6-065[12]) sets out the traffic management implications should structural intervention at Marlesford Bridge be required as a result of the East Anglia ONE North and East Anglia TWO Projects and concludes: "Noting that the bridge span is 6.1m the most likely structural intervention (if required) would be a temporary steel bridge placed over the existing bridge deck. There is potential for this intervention to be implemented under single lane closure, for a period of two days, to avoid the requirement to divert traffic. The lead in time for a Transformer is between 12 and 24 months enabling advance notice to be served to all highway stakeholders and a programme to be agreed with SCC to avoid major events. It is therefore concluded that the driver delay impacts of the roadworks would not be significant."
	Response by Suffolk County Council at Deadline 2	(i) SCC is not aware of any consideration by the Applicant of Marlesford Bridge. However, the Applicant indicates that the largest/heaviest AILs are proposed to be transported to site via the permanent BLF. (ii) Information provided by SPR (See EA1N examination library [REP8-021]) considered that temporary strengthening of the bridge deck would be adequate for their AIL movements. In SCC's response (EA1N examination library [REP9-046]) it was noted that such work would only be permitted outside normal working hours to avoid disruption to traffic using the A12, including that to or from SZC.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2. In particular, it remains the case (notwithstanding the response from Scottish Power Renewables) that the Sizewell C Project does not require the bridge at Marlesford to be strengthened given the use that will be made of the BLF and the heavy load route 100.

[12] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004047-ExA.WQ-2.D6.V1%2008%20EA1N&EA2%20Applicants'%20Responses%20to%20WQ2%20Volume%208%202.18%20Transportation%20and%20Traffic.pdf

ExQ1	Question to:	Question:
	Response by Marlesford Parish Council at Deadline 3	The Applicant explains that for loads under 150t, all road structures on the A12 between the A14 at Seven Hills and the B1122 have all been approved by SCC. For loads in excess of 150t the applicant explains that they will either be brought in by sea of use the Highways England heavy load route 100, which routes from Lowestoft Port to Sizewell. They therefore conclude that "structural alterations to the bridge on the A12 at Marlesford are not considered to be required for the Sizewell C Project". It should be noted that in discussions with Scottish Power Renewables regarding their AIL requirements for EA1-N and EA2, there has been some debate about the future availability of the Belvedere Yard at Lowestoft. MPC therefore believes that the Applicant should have a contingency road plan should loads have to be brought in from the south. For completeness, Scottish Power have said that if Marlesford Bridge has to be used for AILs, they would lay down a temporary bridge deck.
	Response by Suffolk Constabulary at Deadline 3	The challenges to delivering AILs to Lowestoft due to wharf and quay constraints is noted by Suffolk Constabulary, however, this is not a policing issue but may affect the viable routeing from Lowestoft.
	Response by Scottish Power Renewables at Deadline 3	Deadline 8 Submission - EA1N&EA2 Applicants Comments on Suffolk County Councils Deadline 7 Submissions (EA2/EA1N REP8-046) sets out East Anglia ONE North Limited and East Anglia TWO Limited position with regard to Marlesford Bridge. It is clarified that the most likely structural intervention (if required) would be a temporary steel bridge placed over the existing bridge deck. There is potential for this intervention to be implemented under single lane closure, for a period of two days, to avoid the requirement to divert traffic.
	Response by SZC Co. at Deadline 5	Confirmation has been provided by Lowestoft Port to SZC Co. that Belvedere Yard on the south side of the port is now within the Port's ownership. Further information on this is summarised in SZC Co.'s **Written Submissions Responding to Actions Arising from ISH2** (Doc Ref. 9.49).
TT.1.36	The Applicant, SCC	**Fly Parking** Fly parking if uncontrolled will potentially lead to several problems not least of which is modelled traffic flows being underestimated on some routes. Paragraph 13.3.2 of the TA Addendum [AS-266] states further work is ongoing about the management of fly parking.

ExQ1	Question to:	Question:
		Explain how fly parking on the local highway network will be controlled, monitored, and enforced during the construction period.
	Response by SZC Co. at Deadline 2	The updated **Construction Worker Travel Plan** (**CWTP**) (Doc Ref 8.8(A)) sets out the proposed approach to control, monitor and enforce against fly parking. The **CWTP** is secured through the **Deed of Obligation** (Doc. Ref. 8.17(C)). In particular, SZC Co. will employ a fly parking patrol team to identify possible cases of fly parking. They will be both proactive by carrying out daily patrols as well as reactive by following up reports from local residents to the Sizewell C community help line who believe Sizewell C construction workers may be fly parking. In addition to the fly parking team, Sizewell C buses will be fitted with an electronic reader to scan workers' security badges when boarding the park and ride and direct buses. The data will be compared against the data for workers entering the main development site in order to enforce the policy that workers assigned to a park and ride or direct bus service should not drive closer to the main development site and change onto another mode of transport. Workers who enter the site but did not board their allocated direct or park and ride bus would be deemed to have contravened that policy, and appropriate action would be taken and the Transport Review Group notified. Workers will be provided with Driver Rules that must be adhered to. The Worker Code of Conduct will set out a disciplinary process relating to fly-parking. Where a worker's vehicle is proven to be fly-parking, SZC Co. will adopt a just and fair disciplinary process with escalation to higher levels of management at each stage. Ultimately this process could lead to the removal of an individual worker from the Sizewell C Project. Monitoring data from the fly parking team, supplemented by the bus and security gate data, will be used to report occurrences of fly parking per quarter to the Transport Review Group as well as action taken.
	Response by East Suffolk Council at Deadline 2	ESC is more concerned with fly parking arising that is not on the local highway network therefore resulting in planning enforcement being required that is the responsibility of ESC. This is covered in further detail in the LIR [REP1-045].
	Response by Suffolk County Council at Deadline 2	The Applicant sets out that: a) one aim of the CWTP is to transport a significant number of staff by bus and to try to ensure that this occurs. Staff will be allocated a bus to travel to/from the site and an

ExQ1	Question to:	Question:
		electronic reader will be installed on each bus which will compare those staff that arrive at the main development site with those travelling by bus; this will be checked to ensure that staff are using the correct method of travel to/from the site reducing the likelihood of fly parking. b) Any staff living within the 'drive to site catchment' (i.e. inside the area bounded by the A12, River Blyth, and River Deben, excluding Leiston) and who are allocated a permit will be able to drive directly to site reducing the likelihood of them needing to park off-site, and therefore of fly parking. c) As a commitment within the Construction Worker Travel Plan, the Applicant will employ a fly parking patrol team ([APP-609] section 4.7.8) to carry out daily patrols to identify possible cases of fly parking; this will reflect reports by local residents who are concerned about fly parking in their area. Enforcement associated with fly parking is proposed to be undertaken through the 'Worker Code of Conduct', which can result in an individual worker being removed from the project depending on the number of breaches. SCC understands that this process has been relatively successful at Hinkley Point C both in identifying fly parking and reducing fly parking, as well as showing that a number of cases of reported fly parking related to legitimate worker parking; however, it is also recognised that the process may need to be amended through the TRG to reflect specific local circumstances or to be more effective as stated in the CWTP ([APP-609] section 6.4.3). Monitoring will be key to allow for early reactive measures if fly parking does occur.
	Response by SZC Co. at Deadline 3	The SZC Co. response at Deadline 2 and updated **Construction Worker Travel Plan** [REP2-055] provides more detail than the **draft CWTP** submitted with the DCO Application [APP-609]. It is considered that the mechanisms set out in the CWTP will be effective, as indicated by SCC's acknowledgement that this has been the case at Hinkley Point C. SZC Co. further address ESC concerns about potential increased on-street parking as a result of potential increased numbers of houses in multiple occupation in the SZC Co. response in Chapter 15, **Comments on Councils' Local Impact Report** (Doc Ref. 9.29).
	Response by Suffolk Constabulary at Deadline 3	i) Suffolk Constabulary would welcome a definition from the Applicant of the term "fly parking" in order to understand how it would be enforced by the Applicant through the Code of Conduct if there has been no traffic regulation broken or an offence committed. Suffolk Constabulary would also like clarity on how the Applicant's patrols will recognise "fly parking" by their workforce. It is understood that the

ExQ1	Question to:	Question:
		Code of Conduct has not been enforced at HPC where there can be no breach of contract. If "fly parking" is to be enforced by Suffolk Constabulary or under a decriminalised parking regime then a road traffic offence has to have been committed. Reports of the effects of obstruction or complaints from residents over parking are anticipated to be reported to Suffolk Constabulary in the first instance. Suffolk Constabulary will then need to deal with those complaints with other business-as-usual actions where other dedicated resources are not provided for. It is not clear how the Applicant will operate within the Data Protection Act to enact any alleged breaches of the Code of Conduct. The proposed approach to management of "fly parking" is therefore not viable. ii) No further comment on "fly parking". iii) Please refer to Suffolk Constabulary's comments on the responses to TT.1.36
	Response by Stop Sizewell C at Deadline 3	The Applicant's 'Fly Parking Team' would need to proactive and also able to respond immediately to reports of misdemeanours by local communities.
	Response by SZC Co. at Deadline 5	The term "fly parking" is defined for the Sizewell C project at para. 4.7.11 of the **CWTP** [REP2-055]. It states that: "Fly parking refers to construction workers who live outside of the 'drive to site' catchment area, not using their allocated mode of travel to the main development site and instead driving to a location within the 'drive to site' catchment and either walking, cycling or using a direct bus service to access the main development site." The definition of the 'drive to site' catchment is provided at para. 4.7.5 of the **CWTP** [REP2-055]. The catchment is the area bounded by the A12, River Blyth and River Deben, excluding those living within Leiston or within 800m of the main development site. The approach to controlling and monitoring 'fly parking' is described in the **CWTP** [REP2-055] and is considered to be effective based on the experience at Hinkley Point C. Should monitoring data indicate that enhanced measures are required at Sizewell C, they will be agreed through the Transport Review Group (TRG). As is the case at Hinkley Point C, in addition to the daily patrols, the fly parking team will follow up reports of potential fly parking received from local residents to the Sizewell C

ExQ1	Question to:	Question:
		community help line or the Sizewell C information office in Leiston. Suffolk Constabulary will not be expected to deal with fly parking complaints.
TT.1.38	The Applicant, SCC	**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.
	Response by SZC Co. at Deadline 2	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.
	Response by Suffolk County Council at Deadline 2	(i) SCC's understanding is that the site access road junction is temporary and is to be removed following completion of the SZC construction phase; this is to be confirmed by the Applicant. The plans including Fig 2.2.32 in [AS-202] are not consistent with others. Rights of way plan SZC-SZ0204-XX-000-DRW-100344 Rev 3 [AS-113] has been updated to show the bridleway link to Kenton Hills as a permanent feature but does not show the junction. Plan SZC-SZ0204-XX-000-DRW-100105 [AS-119] shows a footway rather than a bridleway on the north side of Lovers Lane. The Transport Assessment Addendum [AD266] section 5.2.13 confirms that the secondary access will no longer be present during the SZC operational phase. The Applicant needs to clarify inter-relation of the rights of way and the secondary site access during the construction and operational phases.

ExQ1	Question to:	Question:
		(ii) The desire line for users of the bridleway would be the most direct route, i.e. the entrance to the Kenton Hills Car Park. However, to obtain adequate visibility on Lovers Lane the crossing point has been located to the west. SCC's view is that the bridleway link is necessary for non-motorised users to access the permissive paths at Kenton Hills during the construction phase. SCC understand that the bridleway crossing will only be provided once the construction phase has completed and the remainder of Bridleway 19 (E-363/019/0), temporarily closed through the campus site, is reopened. For walkers, cyclists and horse riders coming from the west on the bridleway on the north side of Aldhurst Farm, and from Leiston, it will provide a useful and relatively direct link to BR 19 north and to the permissive access on Kenton Hills. For recreational users using the bridleway network in a north-south direction, it is a compromise, as it requires users to cross Lovers Lane twice to access the bridleway in Aldhurst Farm. For these users, a bridleway link wholly to the east of Lovers Lane would have better reflected a desire line.
	Response by SZC Co. at Deadline 3	i) The Deadline 2 response from SZC Co. confirms that the secondary site access junction from Lover's Lane will be removed following construction of Sizewell C, with the right of way converted to a bridleway. During construction of Sizewell C, a shared footway and cycleway will be provided on the north side of Lover's Lane, including a crossing at the secondary site access. The shared footway and cycleway will be converted to a bridleway once construction of Sizewell C is complete and the secondary site access is removed. The submitted plans are correct. ii) The proposed B19 alignment to the north of Lover's Lane avoids removal of SSSI to the east of Lover's Lane. SZC Co. considers the proposed B19 alignment provides a safe route for recreational users, including safe crossing points.
	Response by Suffolk County Council at Deadline 3	(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.

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 5	(i) The alignment shown on the **Access and Rights of Way plans** (Doc Ref. 2.4(D)) is correct for both construction and operational phases. A Footpath Implementation Plan which will be prepared by SZC Co. and submitted to the highway authority for agreement pursuant to the Draft DCO, which will provide sequential plans over the course of construction. (ii) SZC Co. welcomes Suffolk County Council's comments regarding the footpath and bridleway link between Aldhurst Farm and Kenton Hills.
TT.1.39	The Applicant	**Transport Assessment (TA) [AS-017] - Scoping** Paragraph 1.6.1 references extensive scoping discussions. Has there been a formal scoping process with the relevant Highways and Planning Authorities on development of the TA? If so, submit copy of agreed scoping report.
	Response by SZC Co. at Deadline 2	**Section 6.3** of **Volume 1, Appendix 6A** (EIA Scoping Report) of the **ES** [APP-168] describes the Transport Assessment (TA) scope and methodology, addressing comments received from stakeholders on the 2014 EIA Scoping Report. The TA scope and methodology was refined through extensive discussions with Suffolk County Council (SCC), East Suffolk Council (ESC), including monthly Traffic and Transport Workgroup meetings attended by SCC, ESC, Highways England and the Suffolk Constabulary, and fortnightly transport modelling focused meetings with SCC, ESC and Highways England. TA scoping discussions considered the study area, assessment hours, traffic surveys, project trip demand and distribution, modelling methodology, assessment scenarios and years, forecast growth, committed schemes, transport strategy, embedded mitigation and impact assessment criteria.
	Response by Suffolk Constabulary at Deadline 3	Suffolk Constabulary was not consulted on the scope of the Transport Assessment. Suffolk Constabulary has raised comments on the Transport Assessment but has not received responses from the Applicant.
	Response by SZC Co. at Deadline 5	It is standard practice for Transport Assessments to be scoped with the relevant highway authorities. In the case of Sizewell C this is SCC and Highways England. It is not standard practice to agree the scope of Transport Assessments with the police.

ExQ1	Question to:	Question:
		Notwithstanding this, further to SZC Co.'s response at Deadline 2, SCC in their Deadline 2 response to ExQ1 [REP2-192] confirm that the Transport Assessment scope has evolved through four rounds of consultation, in order to respond to various matters that arose. Suffolk Constabulary attend the monthly Traffic and Transport Workgroup meetings along with SCC, ESC and Highways England where the scope of the Transport Assessment has been discussed and augmented where required. In particular SZC Co. have had meetings with Suffolk Constabulary specifically in relation to the management plans and approach to movement of AILs, which are on-going and detailed. The Suffolk Constabulary were also involved in meetings where SZC Co. demonstrated the VISSIM micro-simulation traffic modelling of the A12. SZC Co. provided a response to comments received on the Transport Assessment from Suffolk Constabulary in August 2020.
TT.1.42	The Applicant	**Transport Assessment (TA) [AS-017] – Daily Traffic Variations** Paragraphs 2.3.74 to 2.3.76 outline the assessment of daily variations set out in Table 2.2. Mention is made throughout the TA about traffic variations being compared to daily variations in traffic. What percentage typical daily variation is assumed for these comparisons and how is this derived?
	Response by SZC Co. at Deadline 2	The reference to daily variation in traffic flows within paragraphs 2.3.74 to 2.3.75 of the Transport Assessment [AS-017] (now superseded by the **Consolidated Transport Assessment** (Doc Ref 8.5(B)) was in the context of deriving the flows which the VISUM strategic base model was based on. As set out in response to **TT.1.41** of this chapter, two elements of robustness were factored into the VISUM strategic base model traffic flows. One was with regards to the daily variation observed in the traffic flows collected in the neutral month of May. It was concluded that traffic flows on Monday to Thursday mornings are consistently busier than Friday mornings. The analysis also indicated that Friday afternoon and early evening traffic within the study area is consistently the busiest period of the week, and higher than any other weekday or weekend period in a neutral month. Therefore the VISUM base traffic model was based on observed average Monday to Thursday traffic flows for the AM peak period and Friday traffic flows for the PM peak period. Further analysis of daily variation is provided in Appendix 2C of the **Consolidated Transport Assessment** (Doc Ref 8.5(B)).

ExQ1	Question to:	Question:
		It should be noted, as referenced in response to question **TT.1.83** in this chapter, that by comparing against 'daily variation' it is not intended to imply that there would be no impact of Sizewell C traffic, but rather to demonstrate how the impacts of Sizewell C traffic may be perceived by drivers compared with the variation experienced already on a day-to-day basis.
	Response by Stop Sizewell C at Deadline 3	The Applicant acknowledges that traffic flows will be consistently busier on Monday to Thursday mornings than on Friday mornings, and also higher in the evenings. How will this be affected if (a) car sharing is banned due to Covid regulations, and (b) if more buses are required to ensure social distancing?
	Response by SZC Co. at Deadline 5	Latest advice from the UK Government is that coronavirus restrictions will continue to ease from 19th July, as the country moves to step 4 of the roadmap in line with expectations. Whilst the Government continues to emphasise a cautious approach, most of the legal restrictions will be lifted in step 4, including restrictions on social distancing. SZC Co. will continue to work within government guidance in relation to Covid-19 measures applicable at the time.
TT.1.43	The Applicant	**Transport Assessment (TA) [AS-017] – Journey Times** In Paragraph 2.3.78 explain why Route 3 A12 Martlesham to Sizewell C does not use a route from the A12 further south than the B1122 at Yoxford, when more direct and shorter routes are available.
	Response by SZC Co. at Deadline 2	Journey time 'Route 3', shown in **Figure 2.4** of the **Transport Assessment** [AS-017] (now superseded by the **Consolidated Transport Assessment** (Doc Ref 8.5(B)) is one of four additional journey time routes specifically requested by the emergency services. A number of other journey time routes were agreed with the highway authorities and emergency services and cover a wide range of routes. The question queries why Route 3 does not route to Sizewell C via a more direct route than via the B1122. Route 8 of the original journey time routes covers the route from Martlesham to Sizewell C via the A1152/B1069. This route is illustrated in Plate 8.4 of the **Transport Assessment Addendum** [AS-266] (now superseded by the **Consolidated Transport Assessment** (Doc Ref 8.5(B)).

ExQ1	Question to:	Question:
	Response by Stop Sizewell C at Deadline 3	Route 8 covers the A1152 / B1069 and will be used. Surely all local roads from north, south and west would be used by construction workers and LGVs unless the Applicant forbids this and enforces it through contracts?
	Response by SZC Co. at Deadline 5	See SZC Co. response to TT.1.87, TT.1.25(iii) in REP2-100 which sets out the measures proposed to manage Sizewell C workforce travel to and from work and LGV movements.
TT.1.44	The Applicant	**Transport Assessment (TA) [AS-017] – Policy** Paragraph 3.4.30 states that the Suffolk Rail Prospectus 2015 included the opportunity of achieving a passenger service and station for Leiston as a legacy benefit from the new development at Sizewell should be explored. Explain how this issue has been explored.
	Response by SZC Co. at Deadline 2	During the development of the rail options for Sizewell C since 2016, neither Greater Anglia, DfT or Network Rail have expressed interest in developing proposals for a passenger service and station for Leiston. Given the potential of rail to reduce the number of HGVs travelling to site, SZC Co. considers that there is a compelling case to use all of the train paths for moving freight rather than construction workers. This case is enhanced by the following considerations: • only a limited proportion of the construction workforce is likely to live sufficiently close to a rail station to make daily travel by rail an attractive proposition; • the attractiveness of using rail for workers is likely to be further limited by the constrained frequency of services on the East Suffolk Line and the relatively slow journey time by rail from many locations when compared to travel by car or bus; and • start and finish times for the workforce would not likely always coincide with available rail services, whereas park and ride and direct bus services can be more easily timed and flexibly adapted to meet the required demand. SZC Co.'s proposals do not preclude the eventual delivery of such a service (and provide a legacy benefit through the proposed track improvements), should it be identified that there is sufficient passenger demand, interest from a train operator to run the service, and funding from the DfT or other sources.
	Response by Stop Sizewell C at Deadline 3	Stop Sizewell C considers that more effort should have been put into this.

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 5	No further response from SZC Co. is required.
TT.1.45	The Applicant	**Transport Assessment (TA) [AS-017] – Policy** Paragraph 3.4.33 states that the New Anglia Strategic Economic Plan (2014) details a key transport priority with regards to the Sizewell C development: "A bypass of Stratford St. Andrew, Farnham, Little Glenham and Marlesford is needed to keep HGV traffic off the A12 through these villages." Explain in this context: (i) Why only two of these villages is proposed to be bypassed rather than the four; and (ii) What consideration has been given to the alignment of the Two Village Bypass with respect to the eventual alignment of a four village bypass envisaged in the Plan
	Response by SZC Co. at Deadline 2	(i) An assessment based on guidance in the Design Manual for Roads and Bridges (DMRB) indicated that highway capacity would not be reached in Marlesford, Little Glemham and Stratford St Andrew but the narrowing of the A12 and tight configuration of the bend at Farnham would be likely to cause congestion during the peak construction period of the project. In addition, the Farnham bend is an existing known constraint to abnormal indivisible load (AIL) movements on the A12, as identified by Suffolk Constabulary. In light of the above, SZC Co. considered that the impact of Sizewell C traffic would not be sufficient to justify a bypass of all four villages, particularly as a bypass of this scale would have significant environmental impacts, as noted in the 2006 Four Villages Study by Suffolk County Council (SCC). A four village bypass would therefore be a disproportionate intervention to mitigate the effects of Sizewell C traffic during the construction phase, and therefore it was not included within the application for development consent for the Sizewell C Project. However, it did remain necessary to give further detailed consideration to more local issues and, particularly, issues arising from the bend in Farnham. Four options to deal with the issue at Farnham were presented at Stage 2 consultation – no modifications; bend widening; a Farnham bypass only; and a two village bypass. The last was presented as an alternative given Stage 1 objections to the Farnham bypass. The two village bypass bypasses Farnham and Stratford St Andrew to the south, joining the A12 at Tinker Brook, in an alignment broadly the same as the earlier 2014 SB5 Blue Bypass proposal by SCC (A12 Four Villages Study 2014). The scheme bypasses Stratford St Andrew due to the suitability of the southern alignment rather than because of traffic

ExQ1	Question to:	Question:
		capacity impacts in Stratford St Andrew but would have the added benefit of reducing severance impacts through Farnham and Stratford St Andrew. (ii) The proposed two village bypass would contribute significantly to a four village bypass, if one was developed in the future, by providing the A12/A1094 roundabout at Friday Street, which has been a constant in all of the previous studies by SCC, and the bypass of two of the villages on a similar alignment to that previously preferred by SCC. In theory, the two village bypass could have a spur coming off of it to the south to facilitate a four village bypass, which would continue to bypass Little Glemham and Marlesford. This would require changes to the two village bypass to tie the two together but it could be achieved if a four-village bypass was still sought in the future. SZC Co.'s two village bypass would provide a substantial start to this. However, the alignment of the proposed two village bypass is based on SB5 (blue route) from SCC's 2014 A12 Four Villages Study. The route has evolved as the detail has been developed but it is fundamentally the same route. In the 2014 Study, SCC concluded that "*a staged approach for the implementation of an improvement scheme for the length of A12 between Wickham Market bypass and the junction with A1094 Friday Street – termination point for this study – would be the most suitable solution. Currently the section of A12 between Marlesford and Little Glemham has a layout with comparatively acceptable road widths and geometry. The most difficult section with the worst geometric layout is that between Stratford St Andrew and a point north of Farnham*." Similarly, the DfT's decision (December 2019) to reject the bid for Suffolk's Energy Gateway (SEGWay, 2017) scheme stated that alternative options "*such as a smaller two village bypass*" should be considered. The proposed two village bypass would not prejudice the delivery of a longer, four village bypass in the future but, based on the 2014 Study by SCC and the DfT's decision on the SEGWay proposals, a simpler and better solution would be for a separate bypass of Little Glemham and Marlesford to be brought forward in the future by SCC if deemed appropriate. This solution would meet with the conclusions of SCC's 2006 study that shorter interventions are preferable, the 2014 study that a staged approach would be most suitable, and the DfT's conclusion that a shorter bypass would be better value for money.

ExQ1	Question to:	Question:
		This would be similar to the A12 Four Villages Study (2014) options, which includes SB5 (blue route) – similar to the proposed two village bypass – and a separate bypass option for the other two villages (LB3 and SB4 (bypassing Little Glemham only)).
	Response by Marlesford Parish Council at Deadline 3	In answer, the Applicant states "An assessment based on guidance in the Design Manual for Roads and Bridges (DMRB) indicated that highway capacity would not be reached in Marlesford, Little Glemham and Stratford St Andrew but the narrowing of the A12 and tight configuration of the bend at Farnham would be likely to cause congestion during the peak construction period of the project." MPC accepts that technically this may be the case, but we would point out that a Four Village Bypass has been deemed highly desirable, if not essential since the late 1980's. A full history of the attempts to provide a Four Village Bypass appear in a letter to Baroness Vere (Parliamentary Under-Secretary of State in the Department for Transport) dated 30th June 2020 from Dr Daniel Poulter MP, which has been submitted with this representation. Of particular note is the fact that as recently as October 2018, Suffolk County Council made a bid for funding to Department for Transport (which was unsuccessful) but SEGWay (the Four Village Bypass) remains a strategic objective for SCC. The Applicant goes on to say "The proposed two village bypass would contribute significantly to a four village bypass, if one was developed in the future, by providing the A12/A1094 roundabout at Friday Street, which has been a constant in all of the previous studies by SCC, and the bypass of two of the villages on a similar alignment to that previously preferred by SCC. In theory, the two village bypass could have a spur coming off of it to the south to facilitate a four village bypass, which would continue to bypass Little Glemham and Marlesford." This is at odds with the view expressed by SCC at para 2.24 in their Deadline 2 Written Representation [Rep2-189] and referred to above under Al.1.16. MPC and Great Glemham Parish Council remain of the opinion that the two villages should not be forced to wait until traffic becomes intolerable on the A12 before a bypass is delivered. And under the Applicant's current proposals and according to SCC, it appears that the alignment of the Two Village Bypass will preclude the provision of a bypass for Marlesford and Little Glemham – we have to assume, for at least a generation. This is a missed opportunity to provide a costeffective solution – any later provision of a bypass for Marlesford and Little Glemham will come at a high price because it will not be an integrated project.
	Response by SZC Co. at Deadline 5	SZC Co.'s response at Deadline 2 remains valid.

ExQ1	Question to:	Question:
TT.1.48	SCC, Highways England	**Transport Assessment (TA) [AS-017] / [AS-266] – Modelling Approach** Are you satisfied with the strategic modelling scope and approach outlined in Section 6 of the Transport Assessment?
	Response by SZC Co. at Deadline 2	No response from SZC Co. is required.
	Response by Highways England at Deadline 2	Highways England is satisfied with the strategic modelling scope and approach as outlined in the Transport Assessment with regards to the assessment of impacts on the Strategic Road Network. We have been engaged in discussions with the applicant alongside Suffolk County Council to review aspects of the model
	Response by Suffolk County Council at Deadline 2	The modelling approach which is set out within the Transport Assessment Addendum [AS266] is considered to be acceptable (although we have not reached agreement on the visitor car share factors used and this will be covered in the Statement of Common Ground) subject to relevant caps, monitoring, enforcement and controls on the assessed vehicle movements, as set out in the LIR (LIR Annex M [REP1-058]), and in previous responses, including SCC's Relevant Representation [RR-1174], and to pre-submission consultations. However, whilst the method of assessment is acceptable, the conclusions on the traffic impacts have yet to be agreed.
	Response by SZC Co. at Deadline 3	No further response from SZC Co. is required.
	Response by Suffolk Constabulary at Deadline 3	Suffolk Constabulary notes the response from SCC on the detail of the Transport Planning modelling. Suffolk Constabulary has viewed output videos from the peak hour modelling of A12, which incorporated mitigation proposed as part of the Brightwell Lakes development. Those models indicated only moderate delays along the A12 corridor during those selected periods but did not appraise the effects on the network of the movement of AILs or the residual effects of those movements on the peak hours. This point has been raised with the Applicant.
	Response by SZC Co. at Deadline 5	SCC and Highways England have confirmed their acceptance of the strategic modelling scope and approach in their Deadline 2 responses.

ExQ1	Question to:	Question:
		The **Construction Traffic Management Plan** (**CTMP**) [REP2-054] sets out the proposed management of AILs, which includes the delivery of AILs in accordance with the time limits set out in the Norfolk and Suffolk Constabulary AIL guidance (Dec 2016). Therefore, AIL movements will be scheduled outside of the network peak hours.
TT.1.50	The 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: (iv) The routeing of direct bus services is this correct for all services, including from Saxmundham and Leiston? (v) How is the number of bus passengers derived? (vi) What is the peak number of buses required? (vii) How are LGV numbers derived? (viii) How were the HGV numbers derived? and (ix) Why paragraph 7.2.1 [AS-266] states the only change relates to bus frequency but not overall HGV numbers?
	Response by SZC Co. at Deadline 2	(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** [AS-266]. (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

ExQ1	Question to:	Question:	
			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

ExQ1	Question to:	Question:
		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 park and ride facility per day. (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

ExQ1	Question to:	Question:
		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. (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** [AS-266]: - 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.
	Response by Suffolk County Council at Deadline 3	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

ExQ1	Question to:	Question:
		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.
	Response by Stop Sizewell C at Deadline 3	Calculated number of buses suggests that 16 buses (or five buses in every 10 minutes over 12 hours) will operate on the link road in addition to LGV and HGV movements. In spite of the opportunity (i.e. not affecting construction period) there are no proposals to lay on buses for construction workers in the early years. COVID – does the Applicant accept that Covid-19 social distancing rules, if legally enforceable, may necessitate earlier provision of bus services to reduce car-sharing and also the provision of additional buses to ensure social distancing by limiting passenger numbers? How many buses, and when would they commence operating?
	Response by SZC Co. at Deadline 5	SZC Co. continue to engage with SCC, ESC, Suffolk Constabulary and Highways England on the monitoring and control of Sizewell C traffic movements. An updated Construction Traffic Management Plan and Construction Worker Travel Plan is expected to be submitted at Deadline 6 which will respond to discussions at the Issue Specific Hearings 2 and 3 and subsequent engagement with the relevant authorities. Dedicated buses will be provided for Sizewell C workforce in the early years, as described in Section 4.3 of the **Consolidated Transport Assessment** [REP2-045] and Section 4.3 of the updated **Construction Worker Travel Plan** [REP2-055]. Sizewell C workers parking in the temporary park and ride at the LEEIE will be bussed to the main site. Buses will be offered free of charge to Sizewell C workers. Any direct bus services will need to be agreed with the Transport Review Group (TRG) as described in para. 4.3.6 of the **CWTP** [REP2-055]. See SZC Co.'s response at Deadline 5 to ExA question TT.1.42 in relation to coronavirus restrictions and social distancing.
TT.1.52	The Applicant, SCC	**Transport Assessment (TA) [AS-017] – Classification of HGV.** Paragraph 7.2.43 states "HGVs include, for transport modelling purposes, all goods vehicles over 3.5 tonnes. HGVs are usually classified as goods vehicles over 7.5 tonnes; however, the lower threshold has been applied to provide a robust basis for the Transport Assessment.". Explain this assumption in the following context:

ExQ1	Question to:	Question:
		(i) It is unlikely that the pattern of sizes of goods vehicles associated with the Proposed Development would replicate the sizes of types of goods vehicles in the existing flows surveyed. It is more likely the Proposed Development HGV traffic would be in the 'usual' classification of HGVs mentioned above. That being the case the same usual classification of HGV size of 7.5 tonnes would seem the most accurate one to use; (ii) With the inflation of the baseline number of HGVs represented by the current assessment it would mean that the baseline (existing) level of HGV's are over estimated and therefore percentage increases in HGVs associated with the Proposed Development are being under estimated both in the Transport Assessment and in the Chapter 10 of the ES; and (iii) If the applicant is satisfied that the HGV traffic associated with the Proposed Development will replicate the size pattern of baseline surveyed traffic, explain how this would be controlled within the DCO process to avoid the dominance of much larger vehicles being used.
	Response by SZC Co at Deadline 2	(i) Paragraph 7.2.43 of the **Transport Assessment** [AS-017] incorrectly states that the assessment has assessed a HGV to be goods vehicles over 3.5 tonnes. The baseline HGVs within all of the traffic modelling are based on the standard design manual for roads and bridges (DMRB) classification (i.e. Other goods vehicles (OGV1+OGV2)) as identified within the observed traffic survey data. The traffic modelling of Sizewell C LGVs and HGVs has also taken the standard approach with HGVs being classed as OGV1+OGV2. Therefore, there is no underreporting of HGV impacts within the traffic modelling. This has been rectified in the **Consolidated Transport Assessment** (Doc Ref 8.5(B)). Whilst the assessment has taken a standard approach to assessing HGVs and LGVs, the monitoring of HGVs within the **Construction Traffic Management Plan** (**CTMP**) (Doc Ref 8.7(A)) will include all goods vehicles over 3.5 tonnes. Therefore, any goods vehicle between 3.5 tonnes and 44 tonnes will be classified as a HGV for the purposes of monitoring and will be required to adhere to the HGV routes and would be monitored against the proposed HGV limits. (ii) Refer to the response to (i). The percentage increases in HGVs associated with the Project are not being under estimated.

ExQ1	Question to:	Question:
		(iii) Refer to the response to (i). The assessment is based on the standard classification of HGVs. The monitoring, management and control of HGVs is secured through the **CTMP** (Doc Ref 8.7(A)) and for monitoring purposes a HGV will be classed as any goods vehicle between 3.5 and 44 tonnes.
	Response by Suffolk County Council at Deadline 2	i) SCC has noted that (as per the Transport Assessment [AS-017] paragraph 7.2.43, quoted in this question) HGVs include, for transport modelling purposes, all goods vehicles over 3.5 tonnes. In accordance with CD 224 Traffic Assessment of the Design Manual for Roads and Bridges (DMRB) the vehicle size for OGV1 is a 2 or 3 axle rigid vehicles and makes no reference to weight. As the data provided by survey companies is, usually, based on the vehicle classification set out within DMRB, the baseline data used for the modelling should include all 2 axle rigid vehicles which can be 3.5 tonne to 7.5 tonne vehicles under OGV1. As such the data used for modelling purposes is considered to be correctly applied. SCC accepts for modelling purposes the definition of HGV / OGV is a vehicle over 3.5 tonnes maximum gross vehicle weight (CD224) https://www.standardsforhighways.co.uk/prod/attachments/257e5888-2bfd-492d92d4-ecf7d40428b0?inline=true and government guidance https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/211948/simplified-guide-to-lorry-types-and-weights.pdf). ii) The proportion of OGV1 versus OGV2 has not been accounted for in the Applicant's assessment. If HGV classifications have underestimated the larger proportion of HGVs to be in place due to Sizewell C, then there may be a potential for some impacts to be underestimated. Hence this issue remains under review. iii) SCC recognises that there is a balance between the number and size of HGVs. The position of SCC is firstly to reduce the overall amount of material that is required to be transported by road to the Main Development Site and Associated Development Sites. Thereafter SCC would seek to reduce the number of vehicles by using the largest appropriate ones to the nature of the route, balancing fewer numbers of HGVs against the greater wear to the highway fabric by each individual vehicle. The proposed monitoring of HGV movements within the CTMP includes 3.5 tonne vehicles and therefore also the smaller vehicles above 3.5 tonne will need to follow the routes set for all HGVs and be included for within the caps and controls identified.

ExQ1	Question to:	Question:
	Response by SZC Co at Deadline 3	As stated in SZC Co.'s response at Deadline 2, there has been no error in the estimation of HGVs within the strategic highway models. The environmental assessment is based on total Heavy Duty Vehicles (or HGVs) which are a combination of OGV1 and OGV2 vehicle classes. Therefore, SZC Co. do not believe there is any underrepresentation of HGVs in the assessment.
	Response by Stop Sizewell C at Deadline 3	The Applicant confirms that HGVs are classified as vehicles over 7.5 tonnes (not 3.5 tonnes as mentioned in the transport assessment). There has been considerable focus on HGVs (over 7.5 tonnes). What is the estimated number of additional goods vehicles including vans and 3.5 tonne LGVs in total that will be on the B1122 each day in the early years? Where is this taken into account in the modelling?
	Response by SZC Co at Deadline 5	All Sizewell C vehicles have been included in the traffic modelling as described in the SZC Co. response at Deadline 2. At the Issue Specific Hearings 2 and 3 SZC Co. committed to providing the ExA with more detail on the movement of Sizewell C traffic on the B1122 in the early years of construction, which is set out in **Materials Import and Modal Split** note (Doc Ref. 9.49).
TT.1.61	The Applicant, SCC	**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.
	Response by SZC Co at Deadline 2	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).

ExQ1	Question to:	Question:
		- 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)).
	Response by Suffolk County Council at Deadline 2	(See also answer T1.82 regarding impact of the Sizewell C project on this section of the A12) The A12 Major Road Network assessment includes a number of scenarios all of which includes Sizewell C traffic; these are the following: • 2025: this currently includes traffic from the Early Years Construction phase + EA1N and EA2 construction traffic; • 2028: this currently includes traffic from the Peak Years Construction phase + EA1N and EA2 construction traffic; and • 2040: this currently includes the Sizewell C Operational phase (for confirmation it does not include EA1N or EA2 Traffic as construction would be completed and they generate very low operational traffic). The Sizewell C development has been included in the Core Scenario to reflect TAG Unit M4: Forecasting and Uncertainty. Whilst Sizewell C has been included in the forecasting,

ExQ1	Question to:	Question:
		the proposed works for the Major Road Network (MRN) project are to support Local Plan growth and to accommodate and mitigate associated traffic impacts, as such assessments consider forecasts beyond the build out of Sizewell C, EA1N and EA2. For the delivery of the MRN works, a construction phasing plan is not yet available, however, assuming funding being allocated by the Department for Transport, an indicative timetable would see construction of the highway works being undertaken in phased process between autumn 2023 and winter 2025. SCC would engage with the Applicant on these works and programming to minimise disruption where possible. The Applicant's assessment does not take into consideration the MRN scheme; however, the strategic model takes into account relevant developments and their mitigation measures, of most note is the Brightwell Lakes development which sees improvements to the Brightwell Lakes access road onto the A12 and improvements to the Seven Hills grade separated A12 / A14 junction. However, it should be noted that the microsimulation model did not include the proposed slip-road from the A14 Westbound Off-Slip onto the A1156 Felixstowe Road at the Seven Hills grade separated A12 / A14 junction. This is a limitation in the microsimulation model. For clarity the Applicant's assessment does include an acceptable phased build out of the Brightwell Lakes mitigation, and so includes consideration of the built form of the highway works for the following scenarios: • Early years includes the Brightwell Lakes mitigation at the A12 / Brightwell Lakes access only. • Peak Construction includes the Brightwell Lakes mitigation at A12 / Brightwell Lakes access, A12 / Foxhall Road, A12 / Seven Hills and A12 / Barrack Square. The Applicant's assessment does not consider any impact associated with the traffic management associated with the construction of either of the Brightwell Lakes mitigation nor with the traffic management associated with the construction of the MRN mitigation.
	Response by SZC Co at Deadline 3	SZC Co. recognises the importance of the A12 corridor to the project and will continue to engage with SCC via the Transport Review Group (TRG) throughout the Sizewell C construction period to ensure Sizewell C activities are coordinated with proposed highway works on the A12 and across Suffolk. SCC are correct that the microsimulation model does not include the planned segregated left-turn lane improvement on the A14 westbound off-slip at the A12 / A14 junction. Despite this, queues in the left-hand lane on the off-slip are not predicted to be significant

ExQ1	Question to:	Question:
		with or without Sizewell C traffic. Adding this improvement to the model is therefore unlikely to change the conclusions significantly and, if anything, would reduce the predicted delays. Temporary traffic management (TTM) arrangements that would be in place during construction of the Brightwell Lakes and MRN mitigation have not been assessed as part of the Sizewell C modelling. TTM associated with third-party projects would not normally be assessed in a transport assessment. In addition: 1) the MRN scheme is not a committed highway improvement; 2) TTM would be in place on the A12 only during temporary highway construction works. Any impacts would therefore be short term; 3) Detailed construction phasing plans (e.g. lane closures) and a detailed programme of construction activities is not available to a level of detail that could be modelled. It is expected that any impacts that arise on the A12 due to construction of the Brightwell Lakes and MRN schemes would be mitigated by those projects, and carefully managed by SCC as highway authority, and Highways England in relation to the Seven Hills interchange.
	Response by Suffolk County Council at Deadline 3	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'.
	Response by SZC Co. at Deadline 5	As indicated in SCC's response at Deadline 3, SZC Co. and SCC have not reached agreement on the significance of Sizewell C traffic effects on A12 travel times. Both parties are continuing discussions on the matter.
TT.1.62	The Applicant, SCC, Scottish Power	**Transport Assessment (TA) [AS-017] – Cumulative Assessment with EA1N and EA2** Is the traffic data input provided used in the modelling of the Scottish Power proposal EA1 and EA2 still the correct current data?
	Response by SZC Co. at Deadline 2	SZC Co. recently met with Scottish Power Renewables (SPR) in order to discuss the traffic generation included in the SZC Co. traffic models for EA1N and EA2 (taken from the preliminary environmental information report, PEIR) and compare it with the SPR traffic figures included in their Environmental Statement submitted with their applications for development consent. Whilst there are minor differences, it was agreed these would not have a significant effect on the conclusions presented in the Sizewell C cumulative impact

ExQ1	Question to:	Question:
		assessment included in the **Transport Assessment Addendum** [AS-266] and Environmental Statement. In order to respond to this question, a note (**Appendix 24B**) has been produced summarising the differences in the SPR PEIR and ES traffic inputs.
	Response by Scottish Power Renewables at Deadline 2	East Anglia ONE North Limited and East Anglia TWO Limited have been provided with a copy of the modelling data used by the Sizewell C project to assess the potential for cumulative impacts with the EA1N and EA2 projects. East Anglia ONE North Limited EA1NL and East Anglia TWO Limited EA2L will review this information and revert.
	Response by Suffolk County Council at Deadline 2	The Applicant submitted a technical note to SCC that highlighted the differences in the flows between those assessed within the respective DCOs; it is understood that this technical note will be submitted to the Examining Authority by the Applicant. There are some differences to the flows assessed; however, SCC considers these as very minor and highly unlikely to have a material impact on any conclusions.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2. The technical note referred to by SCC is the note (**Appendix 24B**) referred to in SZC Co.'s **Response to ExQ1s** for Deadline 2 [REP2-112].
	Response by Scottish Power Renewables at Deadline 3	Please refer to comments on responses to ExQ1 PART 3 OF 6 Cu.1.7.
	Response by SZC Co. at Deadline 5	SZC Co. continue to engage with SPR to ensure the cumulative scenarios in the assessment of both projects are as consistent as is practically possible. See SZC Co. Deadline 5 response to Cu.1.7.
TT.1.63	The Applicant, SCC, Scottish Power	**Transport Assessment (TA) [AS-017] – Cumulative Assessment with EA1N and EA2** Explain: (i) How highway mitigations proposed for this project would be aligned with those proposed by East Anglia One North and Two offshore windfarms; (ii) How any overlap of mitigations proposed would be managed to minimise potential abortive work;

ExQ1	Question to:	Question:
		(iii) How highway works would be coordinated between the projects; and (iv) How the Construction Traffic Management Plans would be aligned and managed to ensure consistent approach to traffic management between all projects and existing highway users.
	Response by SZC Co. at Deadline 2	SZC Co. recognise the importance of regular and effective communication between SZC Co., Scottish Power Renewables (SPR) and Suffolk County Council (SCC) to co-ordinate the delivery of highways mitigation, so as to minimise the impact on the community and travelling public, avoid duplication and abortive works. A commitment to regular engagement during design and construction phases is set out in the **Statement of Common Ground** (SoCG) between SZC Co. and SPR. SZC Co. (Doc Ref. 9.10.28). SZC Co. propose to establish clear communications protocols between all three parties, which will be defined in the terms of reference of the Transport Review Group (TRG). (i) The SPR EA1N and EA2 project on-shore order limits overlap with Sizewell C order limits in three locations: (a) Sizewell Gap, (b) A12 / Friday Street and (c) B1069 Snape Road / A1094 Aldeburgh Road. **Appendix 1** to the **SoCG** between SPR and SZC Co. (Doc Ref. 9.10.28) shows the overlapping areas. (a) Sizewell Gap will be used as a construction access during the initial period of construction of Sizewell C, but the works proposed by SPR do not materially conflict with the construction of Sizewell C. EA1N and EA2 have provided an Outline Sizewell Gap Construction Method Statement[13] which describes the nature of the works on Sizewell Gap and how they are proposed to be undertaken to ensure that traffic is not disrupted. (b) Both SZC Co. and SPR propose an improvement at the A12 / A1094 junction. SPR propose a traffic signal scheme, whilst SZC Co. propose a roundabout. It is understood that Suffolk County Council (SCC) have identified that the proposed SZC Co. roundabout improvement, if delivered early enough, could negate the need for the SPR signal scheme. The updated **Implementation Plan** (Doc Ref 8.4I(A)) shows that the Friday Street roundabout is proposed to be delivered early in the Sizewell C construction phase. SZC Co. will continue to engage with SPR and SCC as the detailed delivery programmes

[13] Scottish Power Renewables (2021) Outline Sizewell Gap Construction Method Statement.

ExQ1	Question to:	Question:
		are developed to agree the works required to avoid duplication or abortive work. (c) At the A1094 / B1069 junction SPR propose temporary carriageway widening and vegetation clearance (on B1069) to accommodate AIL movements. SZC Co. mitigation also proposes vegetation clearance (A1094), signs and lines and a reduced speed limit from 60mph to 40mph to improve safety. The mitigation proposals are complementary, and should not lead to any abortive works. (ii) Refer to (i) (iii) The **SoCG** between SZC Co. and SPR (Doc Ref. 9.10.28) states the commitment of SZC Co. and SPR parties to engage regularly during design and construction so that any interface between the projects can be considered at an early stage, recognising it is in the interests of both parties and the wider community. (iv) The SZC Co. **Construction Traffic Management Plan** (**CTMP**) (Doc Ref 8.7(A)) states that the Transport Review Group (TRG) can invite representatives from other organisations to meetings for particular agenda items and this could include SPR to discuss the co-ordination of the two projects if considered necessary by the TRG. As stated above, SZC Co. Also propose to establish clear communications protocols between all three parties, which will be defined in the terms of reference of the Transport Review Group (TRG).
	Response by Scottish Power Renewables at Deadline 2	EA1N&EA2 Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) - Version 02 (East Anglia TWO examination reference REP6-043[14]) sets out the cumulative interactions between the East Anglia ONE North, East Anglia TWO and Sizewell C projects. The Statement of Common Ground with NNB Generation Company (SZC) Limited V2, SZC-501 (East Anglia TWO examination reference REP8-112[15]) confirms:

[14] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004009-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf

[15] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004551-ExA.SoCG-18.D8.V2%20EA1N&EA2%20Statement%20of%20Common%20Ground%20with%20NNB%20Generation%20Company%20(SZC)%20Limited.pdf

ExQ1	Question to:	Question:
		"The Applicants and SZC will engage regularly with each other during design and construction of their respective projects so that any interface between the projects can be considered at an early stage, recognising it is in the interests of the Applicants and SZC as well as the wider community that all projects be coordinated as far as reasonably practicable"
	Response by Suffolk County Council at Deadline 2	i) Given the complexity and programming of projects there are a number of scenarios that could occur; meaning that SCC needs to ensure that each project mitigates its impacts in isolation. It is expected that there will be ongoing engagement between the SCC, ESC, Scottish Power Renewables and Sizewell C Co. SCC considers the timing of interventions is critical to avoid construction activities causing delays to either Sizewell C or East Anglia One North and Two haul routes. This may require some activities being brought forward. ii) SCC considers there are three locations where the potential for abortive work could occur (Marlesford, Yoxford and A12 / A1094 Friday Street junction), and all Projects are expected to mitigate their proportional impacts at these locations. It is anticipated that there will be on going engagement between the relevant parties on the programming of works for all projects, and as set out at Paragraph 83, 101 and 105 of REP9-003 of the EA1N DCO, as part of the final CTMP, SPR will submit details of the mitigation works it proposed to implement (if any) to address predicted impacts at Friday Street junction, Marlesford and Yoxford taking into account of the most up to date information available on the Sizewell C programme to avoid the potential for abortive works. iii) At SZC-402 to 404 of REP8-112 of the EA1N/EA2 DCO, which forms the EA1N / EA2 Statement of Common Ground with SZC Co., there is a commitment for regular engagement between the parties with regards to elements of the EA1N/EA2 mitigation. At SZC-501, there is a commitment to engage regularly between the parties so that any interface between the projects can be considered at an early stage. The Applicant would keep the Councils informed of highway works through the Transport Review Group incorporating their engagement with SPR and it is understood that this commitment will be included in a future submission of the CTMP. iv) The construction management plan of each project reflects their relative works, scale and impacts and as such are not identical. Through the TRG the highway authority will keep the Applicant informed of upcoming highway works and any programming associated with major schemes (i.e. the MRN works). SPR will be appointing a Construction Transport Management Plan Coordinator (paragraph 14 of the Outline Construction Transport

ExQ1	Question to:	Question:
		Management Plan https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010077/EN010077-004831-8.9%20EA1N%20Outline%20Construction%20Traffic%20Management%20Plan%20(Tracked).pdf) for their projects and it will be imperative that they co-operate with their equivalent in the SZC project. In the EA1(N) / EA2 DCO's there is a commitment by NNB and SPR to engage during design and construction of their respective projects (SZC-501 https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010077/EN010077-004486-ExA.SoCG18.D8.V2%20EA1N&EA2%20Statement%20of%20Common%20Ground%20with%2 0NNB%20Generation%20Company%20(SZC)%20Limited.pdf) although SCC feels this short of the details require to assess how this will be done and whether this includes co-operation managing construction and worker trips.
	Response by SZC Co. at Deadline 3	Further to the SZC Co. response at Deadline 2, The **Construction Traffic Management Plan** [REP2-054] outlines the role of the Transport Review Group (TRG) which will be set up prior to construction commencing. In addition to the regular TRG attendees from SCC, ESC and Highways England, specialist ad-hoc attendees may be invited to discuss specific issues. The SPR Construction Transport Management Plan Coordinator could be invited to establish effective coordination of transport aspects between both projects. The Sizewell C Delivery Coordinator may also have a role in coordinating Sizewell C traffic movements (e.g. AILs) with SPR, although this would be subject to further discussion.
	Response by Scottish Power Renewables at Deadline 3	(i)&(ii) Deadline 11 Submission - 8.9 EA1N Outline Construction Traffic Management Plan (Clean) - Version 06 (EA2/EA1N REP11-017 of the East Anglia ONE North and East Anglia TWO examination) contains provisions to manage the mitigation measures with potential for abortive works, namely Friday Street junction, Marlesford and Yoxford by committing to: As part of the final CTMP submitted for approval under Requirement 28, the Applicants will submit further details of the above mitigation works it proposes to implement (if any) to address predicted impacts [at Friday Street junction, Marlesford and Yoxford] taking account of the most up to date information available on the SZC proposals and programme.

ExQ1	Question to:	Question:
		(iii)&(iv) East Anglia ONE North Limited and East Anglia TWO Limited have ongoing engagement with SZC Co. pursuant to the development of the respective parties' DCO plans. Deadline 2 Submission - 9.10.28 Initial Statement of Common Ground - East Anglia One North and Two - Revision 1.0 (REP2-092) contains the following 'in principle' agreement: The Applicant and EA1/EA1N will engage regularly with each other during design and construction of their respective projects so that any interface between the projects can be considered at an early stage, recognising it is in the interests of the Applicant and EA1/EA1N as well as the wider community that all projects be coordinated as far as reasonably practicable.
	Response by SZC Co. at Deadline 5	SZC Co.'s response at Deadline 2 and 3 is still valid. The next version of the **Construction Traffic Management Plan** [REP2-054], which is expected to be issued at Deadline 6, will include a commitment for SZC Co. to engage regularly with SPR and keep the TRG informed of highway works, incorporating engagement and co-ordination with SPR. It should be noted that, through continued engagement with SPR it has been noted that SPR do not intend to close Grove Road north of Friston during construction of EA1N and EA2 as stated at para. 12.4.33 of the **Consolidated Transport Assessment** [REP4-005]. SZC Co. identified an alternative route for cyclists in the event of a closure, but this is no longer required if Grove Road is to remain open.
TT.1.64	The Applicant	**Transport Assessment (TA) [AS-017] – Junction Modelling** In their representation both Suffolk County Council a [RR-1174] paragraph 33 and East Suffolk Council [RR-0342] paragraph 1.204 consider that the highway mitigation proposed by the Applicant is not comprehensive. They propose the areas listed in the two cited paragraphs require additional consideration for improvement. Provide a detailed response to these concerns.
	Response by SZC Co. at Deadline 2	Discussions are ongoing with Suffolk County Council and East Suffolk Council to discuss transport matters and the proposed mitigation. The ongoing discussions include the scope of the proposed transport contingency fund secured via the **Deed of Obligation** (Doc Ref

ExQ1	Question to:	Question:
		8.17(C)), which could be used by the Transport Review Group to mitigate potential unmitigated significant adverse transport effects, should they arise.
	Response by Stop Sizewell C at Deadline 3	Given the intention to make the B1122 a walking and cycling route, what arrangements are being made to accommodate walkers, cyclists and equestrians on that section of the B1122 between and including the proposed Yoxford Roundabout, the new link road spur and within Yoxford itself? Are these arrangements compliant with Government guidance LTN1/20 to ensure the safety and attractiveness of the infrastructure?
	Response by SZC Co. at Deadline 5	See SZC Co.'s response to ExA's question TT.1.95(ii) and **Appendix 24C** of the written response [REP2-112], submitted at Deadline 2 which describes the B1122 mitigation proposals. SZC Co. continue to work with SCC and ESC to agree mitigation for the B1122.
TT.1.66	The Applicant	**Transport Assessment Addendum [AS-266] – Junction Modelling** Junction 5 A1094/ B1069 junction, explain why the cumulative impact of Scottish Power is not considered given that in the assessment in the TA [AS-107] the cumulative impact has the junction operating over capacity in some time periods in both the Early Years and Peak Construction periods with Scottish Power traffic.
	Response by SZC Co. at Deadline 2	Junction 5: A1094 / B1069 Snape Road In the junction modelling within the **Transport Assessment Addendum** [AS-266], the B1069 minor arm is predicted to operate with a maximum ratio of flow to capacity (RFC) of 0.80 due to the combined impact of Sizewell C traffic and the proposed mitigation (see **Table 9.10**). This is within the 0.85 design threshold. The delay results show that the Sizewell C traffic causes delays to increase in 2023 and 2028 by up to 12 seconds per vehicle and by no more than 3 seconds per vehicle in 2034. In the **Transport Assessment Addendum** [AS-266], only results from the without-Scottish Power model are presented within the main body of the report in **Chapter 9**, in the interests of being concise. However, the results for all junction models were provided in **Appendix 9A** [AS-266]. The summary of junction modelling results in Appendix 9A provides the ability to compare the 'J5 existing layout with SPR', 'J5 mitigation layout with SPR' and 'J5 mitigation layout without SPR' results. As set out in **Appendix 9A** of the **Transport Assessment Addendum** [AS-266], the addition of the Scottish Power traffic causes the RFC of the B1069 arm of the junction to increase to 0.96 during the hour of 17:00-18:00 during the early years and peak

ExQ1	Question to:	Question:
		construction phases. All other arms of the junction are shown to operate within the 0.85 RFC design threshold for all assessed hours. The B1069 arm provides direct access to the Scottish Power site and the capacity of the B1069 arm are considered to be an impact of the Scottish Power site and not Sizewell C. An element of caution needs to be given to the junction modelling as it is based on a number of worst case assumptions for both Sizewell C and SPR projects aligning in addition to limitations within the modelling software itself. Given that the junction modelling shows that the junction is expected to operate within the design threshold of 0.85 RFC for all arms and all time periods and scenarios except for one hour (17:00-18:00) in the cumulative assessment for the B1069 arm in the early years and peak construction, it is proposed to monitor and manage the effects at the junction through the **Construction Worker Travel Plan** (**CWTP**) (Doc Ref 8.8(A)) and **Construction Traffic Management Plan** (**CTMP**) (Doc Ref 8.7(A)) rather than provide additional mitigation as part of the DCO. As set out in the **CWTP** (Doc Ref 8.8(A)) and **CTMP** (Doc Ref 8.7(A)), the Transport Review Group (TRG) will be able to draw down from a transport contingency fund during the construction phase if the transport monitoring shows that there are significant unmitigated impacts at particular junctions or roads. Therefore, it is proposed for this junction to be monitored and managed through the transport contingency fund. Any contingency fund mitigation would need to be cognisant of the transport policy set out in National Policy Statement of Energy (EN-1), which states at paragraph 5.13.8 that "*where mitigation is needed, possible demand management measures must be considered and if feasible and operationally reasonable, required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts*." Paragraph 5.13.9 of EN-1 goes on to recognise that the decision maker should "*have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures*." Therefore, demand management measures should be considered by the TRG if drawing down any transport contingency funding ahead of physical highway improvements.
	Response by Scottish Power Renewables at Deadline 3	Deadline 6 Submission - ExA.AS-6.D6.V2 EA1N&EA2 Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) - Version 02, Section 2.5.3 (EA2/EA1N REP6-

ExQ1	Question to:	Question:
		043 of the East Anglia ONE North and East Anglia TWO examination) contains a cumulative assessment of the A1094/B1069 junction and concludes no significant impacts. In reaching that conclusion it is noted that the SZC assessment (AS-266) does not take account of the commitments made in the ONE North and East Anglia TWO Projects' ES to mitigate driver delay (EA2/EA1N APP-074). These include: • Scheduling of construction activities to smooth peak traffic demand; • Increasing the employee to vehicle ratio through the use of minibus pickup or crew vans; or • Increasing the employee to vehicle ratio through incentive measures.
	Response by SZC Co. at Deadline 5	SZC Co. recognises the commitments made by SPR to mitigate driver delay impacts at the A1094/B1069 junction as set out in Deadline 6 Submission - ExA.AS-6.D6.V2 EA1N&EA2 Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) - Version 02, Section 2.5.3 (EA2/EA1N REP6- 043 of the East Anglia ONE North and East Anglia TWO examination).
TT.1.71	The Applicant	**Transport Assessment (TA) [AS-017] – Junction Modelling** Junction 13 A12 / B1122 Junction. Provide a Junction 9 assessment of the early years scenario of the existing layout so as to enable direct comparison of performance between the existing and proposed layouts and in addition so comparison can be made with the Junctions 9 assessment undertaken within the East Anglia windfarm applications.
	Response by SZC Co. at Deadline 2	<u>Junction 13: A12 / B1122</u> A VISSIM micro-simulation assessment was undertaken for the Yoxford area and included the A12 / B1122 junction. The VISSIM model covers the existing and proposed layouts, so junction modelling was not considered necessary at this location from a highway capacity perspective. In the 2023 VISSIM scenarios (no roundabout upgrade), queues and delays on the B1122 approach are expected to increase beyond those observed in 2015. A small increase is predicted in the 2023 Reference Case and a larger increase in the 2023 Early Years scenario, particularly from 07:30-08:00. This was summarised in **Table 24** and **Table 26** of **Appendix 9B** of the **Transport Assessment Addendum** [AS-266]. In the 2028 VISSIM scenarios, queues on the B1122 approach are expected to increase further still in the 2028 Reference Case scenario. However, in the 2028 Peak Construction

ExQ1	Question to:	Question:
		scenario, queues are predicted to return to 2015 levels or better due to the introduction of the roundabout, despite the increase in traffic due to Sizewell C. This was summarised in **Table 36** and **Table 38** of **Appendix 9B** of the **Transport Assessment Addendum** [AS-266]. In the 2034 VISSIM scenarios, queues on the B1122 approach are expected to increase in the 2034 Reference Case scenario. However, in the 2034 operational phase scenario, queues are predicted to return to 2015 levels or better due to the presence of the roundabout. This was summarised in **Table 46** and **Table 48** of **Appendix 9B of** the **Transport Assessment Addendum** [AS-266]. The proposed roundabout does create a small increase in delays (up to +4 seconds per vehicle on average) on the A12 approaches but offers significant relief to the B1122 approach (reducing delay by up to 29 seconds per vehicle on average) mitigating the impacts of both the committed growth and Sizewell C demands.
	Response by Charles Macdowell, B1122 Action Group at Deadline 3	Transport Assessment (TA) [AS-017] – Junction Modelling Junction 13 A12 / B1122 Junction The applicant was asked about the A12/ B1122 junction, both in the Early Years and once the roundabout has been built. We believe that their traffic data (Appendix 9B of the Transport Assessment Addendum) and their response to the ExA was too broad-brush, and did not properly cover the interaction between the B1122 Junction and the A1120 junction in both periods. No reference was made to seasonal peaks in August and the Latitude festival or daily ones - specifically the release of traffic from the Darsham rail crossing, or the substantial delays caused by the construction and integration of the new roundabout on the junction. We maintain that for these reasons substantial congestion and particulate pollution exceeding WHO recommended levels will be inevitable, and we request that the applicant's modelling data should be rerun by a qualified third party. We ask the ExA that if the applicant's traffic modelling proves to be overoptimistic (as we believe it will), and creates unpredicted significant congestion and pollution, what powers will be available to SCC or any other body to restrict SZC traffic movements in order to meet approved levels?

ExQ1	Question to:	Question:
	Response by Scottish Power Renewables at Deadline 3	Assessment Note (Traffic and Transport) - Version 02, Section 2.5.3 (EA2/EA1N REP6-043) contains a cumulative assessment of the A12/B1122 junction and concludes no significant impacts. In reaching that conclusion it is noted that the SZC assessment forecasts the new roundabout would operate with spare capacity for cumulative impact Scenario B1 (Appendix 9B of the Transport Assessment Addendum (AS-266)) and the existing junction would generally operate with spare capacity for a cumulative impact Scenario A2 (8.5 Transport Assessment, Section 9.16 (APP-602)).
	Response by SZC Co. at Deadline 5	The topic of seasonality was discussed at the Issue Specific Hearings 2 and 3 and a commitment made by SZC Co. to prepare a further note on the seasonality of traffic flows, and in particular to compare the uplift in August against the Sizewell B outage traffic levels. This is set out in SZC Co.'s **Written Submissions Responding to Actions Arising from ISH2** (Doc Ref. 9.49) submitted at Deadline 5. The Yoxford VISSIM model was built to assess the A12/B1122 junction as well as the interaction with the A12/A1120 junction, Darsham level crossing, the petrol filling station, northern park and ride access and the A12/A144 junction. It was developed using industry standard and policy compliant software and techniques. The models were audited by Suffolk County Council and accepted by SCC and ESC as an appropriate basis for assessment of the effects of the Sizewell C project. See ref. TM12 in the **Initial Statement of Common Ground – East Suffolk and Suffolk County Council** [REP2-076].
TT.1.72	SCC	**Transport Assessment Addendum [AS-266] – Junction Modelling** Junction 13 A12 / B1122 Junction. Paragraphs 9.5.29 and 9.5.30 suggest that the introduction of the roundabout will add or even create queues on the A12. What is the Highways Authority's view of the introduction of this roundabout?
	Response by SZC Co. at Deadline 2	Refer to the response to **TT.1.71** for SZC Co. position.
	Response by Suffolk County Council at Deadline 2	SCC recognises that the proposed roundabout will create additional delay, particularly for southbound A12 traffic; however, this delay is generally considered to be minor, with some short spikes in queue lengths, which within the modelling are seen to dissipate

ExQ1	Question to:	Question:
		quickly and have been considered in the context of wider impacts. The modelling indicates that the roundabout will reduce delay for B1122 outbound movements, will at points reduce the delay and therefore impact of right turn movements onto the B1122, and the associated blocking of northbound A12 through movements and is likely to be of a road safety benefit for right turning movements. SCC considers the roundabout as acceptable mitigation with a positive impact on B1122 movements, but with a negative impact on traffic flow for A12 southbound traffic.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by Charles Macdowell, B1122 Action Group at Deadline 3	Transport Assessment (TA) [AS-017] – Junction Modelling Junction 13 A12 / B1122 Junction The applicant was asked about the A12/ B1122 junction, both in the Early Years and once the roundabout has been built. We believe that their traffic data (Appendix 9B of the Transport Assessment Addendum) and their response to the ExA was too broad-brush, and did not properly cover the interaction between the B1122 Junction and the A1120 junction in both periods. No reference was made to seasonal peaks in August and the Latitude festival or daily ones - specifically the release of traffic from the Darsham rail crossing, or the substantial delays caused by the construction and integration of the new roundabout on the junction. We maintain that for these reasons substantial congestion and particulate pollution exceeding WHO recommended levels will be inevitable, and we request that the applicant's modelling data should be rerun by a qualified third party. We ask the ExA that if the applicant's traffic modelling proves to be overoptimistic (as we believe it will), and creates unpredicted significant congestion and pollution, what powers will be available to SCC or any other body to restrict SZC traffic movements in order to meet approved levels?
	Response by SZC Co. at Deadline 5	Refer to the response to **TT.1.71** for SZC Co. position.

ExQ1	Question to:	Question:
TT.1.82	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?
	Response by SZC Co. at Deadline 2	A12 corridor assessment 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.
	Response by Highways England at Deadline 2	Highways England has no comments to make. However depending on Suffolk County Council's response to ExA, we may wish to provide comment/respond if necessary by the 24th June deadline
	Response by Suffolk County Council at Deadline 2	SCC do not agree with the conclusion that mitigation is not required on this corridor. SCC recognises that issues along this corridor are both pre-existing and worsened by general background growth, but that these issues will be further exacerbated by Sizewell C traffic. In particular, the Applicant's modelling, for which there is inherent risk within the results, has identified that the increase in traffic will result in the following impacts: a) In the early years average delay per vehicle will increase by 3 to 5 seconds and total delays on the corridor by 24 to 43 hours as a result of Sizewell C traffic. North to south journey times along the entire length of the corridor would increase by between 1 and 18 seconds depending on the hour and direction as a result of Sizewell C traffic. However, as noted under c), there are notable significant impacts of delay in specific location.

ExQ1	Question to:	Question:
		b) For Peak Construction, a number of scenarios have been modelled, but average delay per vehicle would increase by between 5 and 13 seconds and total delay would increase between 56 and 152 hours as a result of Sizewell C traffic. North to south journey times would increase by between 1 and 62 seconds depending on the hour and direction as a result of Sizewell C traffic. However, as noted under d), there are notable significant impacts of delay in specific location. c) Some examples of noticeable impacts in the Early Years scenario include the following: o An approximate 17min increase in the queue length on the A12 north approach to the A12 / A1214 roundabout. o An approximate 43min increase in the queue length on the Foxhall Road approach to the A12 / Foxhall Road roundabout. o An approximate 24min increase in the queue length on the Barrack Square approach to the A12 / Barrack Square roundabout. d) Some examples of noticeable impacts in the Peak Years scenario include the following: o An approximate 113min increase in the queue length on the A12 south approach to the A12 / B1438 roundabout. o An approximate 76min increase in the queue length on the A12 south approach to the A12 / B1079 roundabout. o An approximate 82min increase in the queue length on the A12 north approach to the A12 / A1214 roundabout. o An approximate 104min increase in the queue length on the Anson Road approach to the A12 / Anson Road roundabout o An approximate 91min increase in the queue length on the A12 north approach to the A14 / A12 Seven Hills roundabout e) Although the methodology and therefore the outputs of the environmental assessment of road traffic have not been agreed, there are a number of locations along the corridor where the Applicant has identified a Major Adverse impact on Fear and Intimidation. f) Outside of the impacts identified above, which are averages, there are the less quantifiable impacts associated with reduced capacity and increased journey times associated with AILs and increased incidents. These impacts will result the following:

ExQ1	Question to:	Question:
		a) Negative impacts on the Suffolk economy, including on tourism, as a result of increased journey times (real and perceived); b) Reduced resilience along the corridor; c) Negative impacts on road safety as a result of increased congestion and driver frustration; d) Increased severance along the corridor; and e) Reduced vulnerable road user amenity along the corridor, particularly for pedestrians on the A12 at Woodbridge, and cyclists along the corridor. While large vehicles cannot deviate from the A12 or B1122, significant delays or disruption on this route will displace light vehicles to other routes such as the A1152/B1069 or B1078 preferable for workers. This may then result in additional impacts elsewhere. Notwithstanding the comments made on the modelled results, the modelling within the Transport Assessment relies on the assumption made regarding the volumes of construction traffic using the network particularly during peak hours. For example, the assumed shift pattens for workers places most journeys outside peak hours, and the number of peak hour HGV movements are currently not proposed to be capped. SCC considers this a significant risk and is requesting suitable monitoring and controls to ensure that the theoretical numbers assumed in the modelling are not exceeded. See LIR [REP1-045]. SCC are preparing a bid for funding improvements to the A12 corridor east of Ipswich. These are primarily to support local growth over and beyond the duration of the Local Plan but would reduce delays and mitigate some of the impacts resulting from SZC. SCC as the local Highway Authority expects the Applicant to provide a proportional financial contribution towards Major Road Network (MRN) improvements, to mitigate Sizewell C's impacts on capacity, economic impacts of congestion, impacts on fear and intimidation and road safety along this part of the A12. The economic impacts of congestion as a result of Sizewell C construction traffic for this corridor is evidenced by a high-level assessment by Aecom commissioned by SCC, which is submitted as SCC Appendix to ExQ SE.1.42. Accepting the limitations of this assessment in terms of it not being able to provide an exact prediction of the economic impact, SCC considers that the assessment clearly indicates a significant negative cost on the economy for the A12 corridor between Seven Hills and A1152 Woods Lane as a result of increased congestion from Sizewell C construction traffic. It should be noted that these

ExQ1	Question to:	Question:
		calculations do not include any assessment as a result of disruption caused by traffic management as a result of highway works nor as a result of abnormal loads. The identified range of the economic impacts based on the high level assessment method needs to be considered alongside the other impacts on this corridor, and supports the case for Sizewell C to provide a proportionate contribution towards the MRN improvements. The proposed MRN improvements may also make the A12 a more attractive route in terms of journey time and reliability for workers than cross country routes such as the B1078, thus may reduce the impact of Sizewell C on these routes. If the MRN bid is unsuccessful the LHA will be looking to secure localised highway improvements funded by the Applicant to mitigate the specific SZC transport impacts on the A12 corridor. SCC considers that the Applicant needs to contribute to the mitigation as suggested above, and disagrees that reliance on the contingency fund to provide mitigation would be appropriate in this case. If mitigation was reliant on the contingency fund, the mitigation would be reactive, i.e. an impact occurring would trigger a need for mitigation which would at that point still need to be designed and delivered. Thus, mitigation on the A12 corridor would only be delivered after the impact or would not be possible to deliver it due to the combined impact of construction traffic and disruption of the construction of the mitigation itself.
	Response by SZC Co. at Deadline 3	The queue length and delay results quoted by SCC are from the A12 VISSIM modelling results reported in **Appendix 9C** of the **Transport Assessment Addendum** [AS-270]. Following further discussion with SCC and Highways England, the A12 VISSIM model was refined. Updated results are reported in **Appendix 9C** of the **Consolidated Transport Assessment** [REP2-051]. The queue length and journey time results quoted above for the peak construction phase are from the Integrated Freight Strategy described in the **Transport Assessment** [APP-602] submitted with the DCO Application (May 2020), and not the preferred freight management strategy described in the **Freight Management Strategy** [AS-280] submitted to PINS in January 2021. The preferred freight management strategy results in significantly fewer HGV movements on the network (from 1,000 movements per day during the busiest day to 700 movements per day), and therefore lower impacts than reported above. For the sake of clarity, the "total delay" figures quoted in SCC's response at Deadline 2 (items a. and b.) do not represent the delay experienced by an individual driver along the

ExQ1	Question to:	Question:
		study corridor (i.e. 3-5 seconds in the early years and 5-13 seconds during peak construction). The "total delay" figures quoted are instead the product of the individual delay per vehicle and the total number of vehicles, i.e. vehicle.hrs. Also, the queue lengths quoted in items c. and d. are in "metres", not "minutes" as shown. So, reproducing for clarity: "c) Some examples of noticeable impacts in the Early Years scenario include the following: o An approximate **17 metres (two cars)** increase in the queue length on the A12 north approach to the A12 / A1214 roundabout. o An approximate **43 metres (seven cars)** increase in the queue length on the Foxhall Road approach to the A12 / Foxhall Road roundabout. o An approximate **24 metres (four cars)** increase in the queue length on the Barrack Square approach to the A12 / Barrack Square roundabout. d) Some examples of noticeable impacts in the Peak Years scenario include the following: o An approximate **113 metres (19 cars)** increase in the queue length on the A12 south approach to the A12 / B1438 roundabout. o An approximate **76 metres (13 cars)** increase in the queue length on the A12 south approach to the A12 / B1079 roundabout. o An approximate **82 metres (14 cars)** increase in the queue length on the A12 north approach to the A12 / A1214 roundabout. o An approximate **104 metres (17 cars)** increase in the queue length on the Anson Road approach to the A12 / Anson Road roundabout [SZC Co. do not recognise this queue length result] o An approximate **91 metres (15 cars)** increase in the queue length on the A12 north approach to the A14 / A12 Seven Hills roundabout [SZC Co. do not recognise this result.] " See response to SE.1.42 in relation to the economic cost of congestion on the A12. Contrary to SCC's statement above that "the number of peak hour HGV movements are currently not proposed to be capped", peak hour caps on HGV movements are proposed by SZC Co. Details of the maximum peak hour number of HGVs permitted are provided in the **Construction Traffic Management Plan** [REP2-054] submitted at Deadline 2. Also see response to **TT.1.25** in relation to monitoring of HGV movements through the CTMP.

ExQ1	Question to:	Question:
	Response by Suffolk County Council at Deadline 3	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'. Refer to [REP2-517] for tracked change version of SCC response to TT.1.82.
	Response by Woodbridge Town Council at Deadline 3	WTC concurs with SCC's response at Deadline 2 that the applicant's figures of only a few extra seconds per vehicle through this section of road don't seem credible. We also agree that improvements to this section of the A12 are needed in preparation for Sizewell traffic, not after problems have started occurring. We concur that the Applicant should contribute to the funding of these improvements to ensure they happen in time to lessen the worst impacts of the construction traffic.
	Response by SZC Co. at Deadline 5	See SZC Co.'s Deadline 5 response to TT.1.61.
TT.1.84	SCC	**Transport Assessment Addendum [AS-266] – Road Traffic Collision Forecasts** Section 10.2 sets out the Applicant's approach to assessment of future road traffic collisions. Do you agree with the assessment approach used and also in general where they suggest improvements these are required?
	Response by SZC Co. at Deadline 2	No response from SZC Co. is required.
	Response by Suffolk County Council at Deadline 2	The assessment method is considered by SCC to be acceptable, and those locations identified are considered to be reasonable given the road collision histories and relevant modelling. However, road collisions will need to be monitored through the Transport Review Group to identify any potential unforeseen issues. In particular, given the modelled operation of the B1078/B1079 junction, SCC considers the works proposed by the Applicant here to be necessary and continued operation of the junction needs to be reviewed.

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 3	Section 9.5 of the **Construction Traffic Management Plan** (CTMP) [REP2-054] describes the process through which funding will be released from the Contingent Effects Funds to mitigate any significant adverse transport effects, should they arise. The Contingent Effects Funds will be secured through the **Draft Deed of Obligation** (Doc Ref. 8.17(D)) and administered by the Transport Review Group (TRG). Only the agreed road links identified in an annex of the **Draft Deed of Obligation** (Doc Ref. 8.17(D)) can be put forward for potential contingency funding. The list of junctions and links that would be included in the annex are subject to ongoing discussions with SCC. The decision on drawing down funding from the Contingent Effects Funds will be taken by TRG, based on a range of evidence including "*PICs (personal injury collisions) involving Sizewell C vehicles*" and "*Review of PIC trends and causation factors*" as described in the CTMP. Where required, an independent road safety auditor would be appointed to review the evidence, determine if Sizewell C traffic resulted in a significant adverse road safety impact, and if appropriate, put forward recommendations for mitigation. Review of road safety data described in **Chapter 10** of the **Consolidated Transport Assessment** [REP2-045] shows that there has been only one collision at the B1078/B1079 junction in the most recent five-year period. However, there were 47 road traffic collisions over that period along the 22km length of the B1078 from the A140 (near the A14) to Wickham Market. SZC Co. have therefore proposed a **B1078 Road Safety Contribution** fund, secured via the **Draft Deed of Obligation** (Doc Ref. 8.17(D)) to fund road safety works along the corridor. Potential road safety improvements have been developed in consultation with SCC and those measures are described in section 10.4 of the **Consolidated Transport Assessment** [REP2-045]. Within those proposals SZC Co. propose vegetation maintenance to increase visibility for vehicles at the B1078/B1079 junction to reduce the risk of collisions.
	Response by Suffolk Constabulary at Deadline 3	Suffolk Constabulary is not part of the TRG and will therefore not be party to reviews of collisions. It proposed by Suffolk Constabulary that it is included within the constitution of the TRG to allow fuller and more succinct review and management of Roads Policing aspects of the SZC project. This could include the detailed planning of temporary roads interventions.

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 5	The governance of the Transport Review Group (TRG) was discussed at the Issue Specific Hearings 2 and 3 on Transport. Further information on the TRG is provided in SZC Co.'s **Written Submissions Responding to Actions Arising from ISH3** (Doc Ref. 9.50).
TT.1.87	The Applicant, SCC	**"Rat Running" Traffic Routes** Numerous Relevant Representations have raised concerns around rat running through less suitable routes by workers and traffic associated with Sizewell C. Explain measures that are proposed or that could be employed to ensure compliance with recommended routes including any signing and digital navigation services proposed.
	Response by SZC Co. at Deadline 2	All goods vehicles over 3.5 tonnes (larger LGV and all HGVs) and all Sizewell C buses will be on fixed routes to/from the main development site. SZC Co. will monitor the HGV routes using GPS technology, as secured in the **Construction Traffic Management Plan** (**CTMP**) (Doc Ref 8.7(A)), which will be appended to the **Deed of Obligation** (Doc Ref 8.17(C)). LGV movements to/from the main development site will be booked into the delivery management system (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. LGVs less than 3.5 tonnes 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, provided that the number of LGVs to/from the main development site is within the assessed level of LGV movements, which will be monitored. In addition, the vast majority if not all of the LGVs to/from the postal consolidation facility will already be on the network rather than new trips. They have only been assessed as new trips within the **Consolidated Transport Assessment** (Doc Ref 8.5(B)) in order to provide a worst case assessment. Construction worker car trips will have route choice but would be managed as follows: • Only workers living inside the area bounded by the A12, River Blyth, and River Deben (except those living in Leiston or within 800m of the main development site) will be issued a parking permit for the main development site on-site parking. This will act to limit the number of car trips to/from the main development site.

ExQ1	Question to:	Question:
		• The purpose of the northern and southern park and ride facilities is to intercept construction worker car trips and consolidate them onto buses in order to reduce the effect of worker car trips on the highway network. A construction signage strategy will be implemented by SZC Co. and is to be secured via the **Deed of Obligation** (Doc Ref 8.17(C)). From the A14 /A140 junction near Needham Market, yellow backed signs will direct all construction traffic to use A14, A12 and B1122 (early years) / Sizewell link road (once open to traffic) to reach the main development site. This is the fixed route that goods vehicles over 3.5T and SZC Co buses (southern park and ride facility and those direct from Ipswich and Woodbridge), will be required to use. The signage strategy will also direct buses from the northern park and ride facility and direct buses from Lowestoft to use the A12 and B1122/Sizewell link road.
	Response by Suffolk County Council at Deadline 2	It is important to note that for a large number of workers' journeys, the natural route for them to travel from their home either to the Main Development Site, or the Park and Ride sites will not be via the A12, B1122 or Sizewell Link Road, and so vehicle movements by workers, whilst not reasonably considered as rat running, will increase along the vast majority of local roads. Vehicle movements will also increase as non-home bound workers undertake other non-work journeys. For workers travelling by car or motorcycle, no measures are proposed by the Applicant to control their routes as these will largely be dependent on the point of origin. The combination of large construction vehicles and workers using the main routes in the area may also result in local drivers seeking alternate routes on minor roads. Thus, SCC considers that it is likely that many workers and local drivers will switch to minor routes 'rat running' through local communities. Experience gained during temporary road closures is that these issues can be hard to predict and the impacts are not solely related to the increase in traffic. The nature of the roads often have a considerable importance in local residents' perception of the issues. There are a number of measures that the Applicant has proposed to reduce the potential impacts of worker vehicle movements; these include: a) Provision of the accommodation campus and LEEIE caravan park (both by ensuring they do not need to drive to site and providing facilities meaning that in some cases they will not need to travel off-site) b) The Park and Rides (including the postal consolidation facility)

ExQ1	Question to:	Question:
		c) The Lowestoft Bus service d) The Ipswich Bus Service e) The Woodbridge Bus service Further to the bus services modelled above, as part of the bus strategy, as the development builds out, locations that could support a bus service to reduce impacts on rural communities will be identified and investigated through the Transport Review Group. The current aim through the CWTP is for approximately 80% of the workforce to travel by either walk, cycle, direct bus or park and ride to/from the site. In order to ensure that staff travel to the site by the correct bus (i.e. their nearest bus), the proposals include a parking permit system, an electronic reader for bus passengers and allocation of model of travel. These details will be further updated in a revised submission of the Construction Workforce Travel Plan, and forms a continued area of engagement between SCC and the Applicant. Additional controls for Sizewell C should include: • Monitoring and enforcement of controls on HGVs and LGVs as stated in the management plans. • Effective management of the parking controls for workers • Setting of rules for good behaviour for workers when travelling to work • Signage strategy for freight vehicles and workers. To date these have been of a strategic nature focusing on the A14 and A12 directing traffic o SZC, the FMF or the park and ride sites. Where reports of rat running are received during the construction of SZC the TRG must have clear guidance to evaluate the issues raised and where necessary instigate action. This could include: • Modification or enforcement of management plans • signage such as unsuitable for traffic signs • Temporary speed control or other legal or physical restrictions on the highway, local self-help (VAS) or enforcement (subject to suitable resources being provided) SCC is conscious that the nature of the intervention needs to be flexible and fitting to the circumstances. While tracking of HGVs, buses and potentially LGVs by GPS appears to SCC to be a practical method this may not be the case for workers travelling to the park and ride site.

ExQ1	Question to:	Question:
		Journeys to a place of work i.e. starting at the park and ride site are undertaken as a private individual and it is difficult to see how tracking can be imposed on workers when they are not at work.
	Response by SZC Co. at Deadline 3	In response to the additional controls listed by SCC in their response: a) **Chapters 4** and **5** of the **CTMP** [REP2-054] describes the proposed measures to manage HGV (goods vehicles over 3.5 tonnes) deliveries to and from the main development site and associated development sites respectively. **Chapter 6** of the **CTMP** sets out the proposed measures to manage the movement of LGVs. **Chapter 8** and **9** of the **CTMP** describes the proposed monitoring and enforcement of proposed controls. b) **Chapter 4** of the **CWTP** [REP2-055] describes the measures proposed to control parking for workers across the project. **Chapter 5** of the **CWTP** describes the monitoring and data collection proposed for reporting to the Transport Review Group (TRG). Monitoring includes car park utilisation levels as well as fly-parking – including operation of a fly-parking team. c) As set out in **Chapter 6** of the **CWTP** [REP2-055] workers will be provided with Driver Rules that must be adhered to. The Worker Code of Conduct will be part of worker contractual conditions, which workers will be required to agree to and accept. SZC Co. will set out a disciplinary process to ensure compliance with code of conduct, e.g. in relation to fly-parking. A specific session during the workforce induction process will cover transport issues. d) SZC Co. has developed a strategic signage strategy for the early years and peak construction phase of the project. The signage strategy considers an extensive area including the A14 and A140 around Stowmarket in the west, the A14 around Ipswich in the south, the A12 and A145 around Lowestoft in the north and other A- and B-roads connecting with the A12 where they are forecast to be used by Sizewell C traffic. A more detailed plan of signage has been developed around the A12 / B1078 junction at Wickham Market, and at Leiston. SZC Co. have consulted on this strategy with SCC, ESC, Wickham Market Parish Council and Leiston Town Council. **Chapter 4** of the **CTMP** [REP2-054] broadly describes the proposed strategy. The signage strategy will be developed by SZC Co., including further detail of signage around the main

ExQ1	Question to:	Question:
		development site. Permanent highway signage has been discussed with SCC (ref. HWY04) and captured in the **Initial Statement of Common Ground** [REP2-076].
	Response by Charles Macdowell, B1122 Action Group at Deadline 3	The ExA stated that many Relevant Representations have raised concerns around rat running through less suitable routes by workers and traffic associated with Sizewell C. We believe these concerns are primarily about private commuter cars and contractor LGVs which the applicant concedes will have 'route choice'. The applicant does not consider this adequately in the Early Years phase, before the Park and Ride operations or the SLR will be in place, We believe that the poor, North-West alignment of the Sizewell Link Road will exacerbate this issue, as many commuters and LGVs will 'cut the corner' southwards, and use inadequate country lanes (many of which are single track) via Knodishall, Friston and Coldfair Green. We are not convinced that the applicant's modelling has accointed for this sufficiently. We request: • that the applicant institutes a tracking system for private worker cars and contractor LGVs to keep them to the allocated routes, either through GPS issued tracking devices or ANPR cameras, • that SCC or another body retain powers to restrict worker car and LGV traffic if it exceeds approved levels, • that activity on the Main Construction Site not commence until the Park and Ride operations or the SLR are operational.
	Response by Marlesford Parish Council at Deadline 3	This is a hugely important issue for the villages around the Southern Park and Ride and the inevitability of "rat running" is acknowledged by SCC in their answer to the question when they state, "Thus, SCC considers that it is likely that many workers and local drivers will switch to minor routes 'rat running' through local communities." MPC considers that there needs to be more commitment from both the Applicant and SCC towards finding solutions to addressing this problem which is likely to make life extremely difficult for residents local to the Southern Park and Ride. The issue should not be put into the "too difficult to resolve" box. We would expect to continue discussions with the Applicant and SCC in order to solve the problem. MPC welcomes the fact that all goods vehicles over 3.5 tonnes (larger LGV and all HGVs) and all Sizewell C buses will be on fixed routes to/from the main development site and

ExQ1	Question to:	Question:
		that the Applicant will monitor the HGV routes using GPS technology, as secured in the Construction Traffic Management Plan. We are less convinced about the control of LGVs arriving and leaving the Southern Park and Ride. The Applicant states that LGVs visiting the main site will be booked into the Delivery Management System and will presumably therefore be controlled in terms of routes. It is not clear that suitable controls will be in place for LGVs visiting the Postal Consolidation Facility at the Southern Park and Ride. We believe that the technology exists to be able to control these movements and anything that can be done by the Applicant to keep LGVs off minor roads (particularly the B1078 to the west of Wickham Market) should be done. We welcome the Applicant's Road Signage Strategy, but believe it needs to be further refined and we are happy to work with the Applicant to develop the strategy. A continual monitoring of the effectiveness of the Signage Strategy should be maintained once construction starts and effectiveness should be a standing item on the Transport Review Group's agenda.
	Response by Woodbridge Town Council at Deadline 3	WTC comment – this is a difficult area, and SCC's answer is a list of ideas and good intentions but doesn't mention any positive way that rat-running could be stopped. However, one suggestion is an ANPR-based system, such as is used in car-parks, roadworks and congestion charging zones. Sizewell workers would have to register their vehicle to get it onto the site, and ANPR cameras would detect if they'd been on rat-run routes. There is more detail on this in the Deadline 2 submission from Wickham Market Parish Council [REP2-493], section 2.1.2 and Appendix 1. The Applicant should pay for this. PLANNING ISSUES highlighted • Safety and service impact on the East Suffolk Line • Health and wellbeing for Woodbridge residents arising from noise and vibration, both from day-time/evening HGVs and night-time trains. • Road traffic impacts in Woodbridge from railway level crossing operation in Melton • Crossing obstructions from trains held at Woodbridge stations in both up and down directions • Economic impacts of road freight traffic starting before A12 improvements complete.

ExQ1	Question to:	Question:
		• Traffic management problems with road freight traffic starting before A12 improvements complete. • Cumulative impact of a massive amount of extra HGV traffic and road infrastructure improvement.
	Response by SZC Co. at Deadline 5	The strategic VISUM modelling traffic flow forecasts described in **Chapter 8** of the **Consolidated Transport Assessment** [REP4-005] take account of the route choice of cars and LGVs across the public highway network. The strategic VISUM traffic model forecasts were used to inform the Transport effects documented in Section 2.5, **Chapter 2** of the **Environmental Statement Addendum** [AS-181]. A further, more detailed modelling assessment of individual junctions was also described in **Chapter 9** of the **Consolidated Transport Assessment**. That detailed junction modelling was based on a robust forecast of traffic flows across the Suffolk highway network, allowing for driver route choice for cars and LGVs. Both the strategic VISUM and detailed local traffic models were audited by Suffolk County Council and their appointed technical consultants and accepted as an appropriate basis for the assessment of the effects of Sizewell C. See the **Initial Statement of Common Ground – East Suffolk Council and Suffolk County Council** [REP2-076]. Section 9.5 of the **Construction Traffic Management Plan** (CTMP) [REP2-054] describes the process through which funding will be released from the Contingent Effects Funds to mitigate any significant adverse transport effects, should they arise. The Contingent Effects Funds will be secured through the **Draft Deed of Obligation** (Doc Ref. 8.17(E)) and administered by the Transport Review Group (TRG). SZC Co.'s position on tracking worker cars is set out in SZC Co.'s **Written Submissions Responding to Actions Arising from ISH2** (Doc Ref. 9.49).
TT.1.91	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

ExQ1	Question to:	Question:
		alignments with reference to the initial modelling undertaken and include any initial modelling assessment
	Response by SZC Co. at Deadline 2	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.

ExQ1	Question to:	Question:
		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.
	Response by Charles Macdowell, B1122 Action Group at Deadline 3	Like SCC, we maintain that the alternative Route W North/ D2 was not properly considered or modelled. The applicant assumed that the 10-15% of HGV traffic that would come from the North would be routed on the A12 through Yoxford to meet W North south of Saxmundham. They did not consider the possibility that this could be routed along the existing B1122. Initial discussions with Middleton and Theberton Parish Councils indicate that they would be open to a discussion on this, and that it may be a price worth paying to lose the proposed SLR route.
	Response by Suffolk County Council at Deadline 3	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.
	Response by Stop Sizewell C at Deadline 3	The Applicant states that the SLR provides the main connection to the site after the early years and is proposed as a result of previous objections to the use of a slightly improved B1122 throughout the development period. • Alternative routes (including route W / D2) would result in a worse impact on the landscape and listed structures • Route W is longer than route Z • Route W, if delivered alone, would mean HGVs travelling through Yoxford or on the B1122, devaluing the purpose of building a relief road. We do not accept that the alternative routes (including W/D2) would result in a worse result. The land to the west of Leiston is a flat former airfield, and a road here would be built to grade without cuttings or embankments to within half a mile of the A12.

ExQ1	Question to:	Question:
		Route W/ D2 would only be marginally longer – 8km versus 7, but this must be balanced against its flatter, less disruptive and probably cheaper profile, its avoidance of villages and hamlets and its considerably greater legacy value Does the Applicant accept that a fully-specified DMRB layout is heavy-handed in the countryside and that a more sensitive design can be developed that meets all safety and loading requirements without the magnitude of adverse impacts on the landscape? The overriding argument is that neither route is completely satisfactory and the Applicant needs to provide answers and agree them with the Highway Authority and local communities. The Applicant has failed to achieve this agreement in 9 years of pre-DCO consultations
	Response by SZC Co. at Deadline 5	SZC Co.'s response at Deadline 2 remains valid. SZC Co. is grateful to Suffolk County Council (SCC) for its revised position at Deadline 3 following its review of the information submitted at Deadline 2.
TT.1.92	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?
	Response by SZC Co. at Deadline 2	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.

ExQ1	Question to:	Question:
		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 **AI.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.
	Response by Charles Macdowell, B1122 Action Group at Deadline 3	We believe that those Relevant Representations that state the poor level of legacy benefit from the proposed SLR route are comparing it with the alternative Route W North/ D2. The latter would reduce post-construction traffic through the villages on the B1122 by at least as much as the SLR. It would also provide a much better route to reach the several proposed energy projects west and south of Leiston, and would connect Leiston directly to the A12. This would have a positive employment effect on the town once the construction 'boom' has abated – a significant problem after the construction of Sizewell A and B.
	Response by Suffolk County Council at Deadline 3	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.
	Response by Stop Sizewell C at Deadline 3	The Applicant claims the following benefits: • A permanent reduction of traffic on the B1122.

ExQ1	Question to:	Question:
		• The permanent reduction of traffic would be felt even when there are outages. The B1122 would, as a result, become more popular with pedestrians, cyclists and equestrians. These arguments do not justify the wrong route for many good reasons and these have been illustrated in Stop Sizewell C's written representations. A quieter B1122 would not be a sufficient attraction for visitors deterred by the development from visiting in the first place.
	Response by SZC Co. at Deadline 5	SZC Co.'s response at Deadline 2 remains valid. Furthermore SZC Co. continue to work with SCC and ESC to develop a vision, and clear proposals, for a repurposed B1122 once the Sizewell Link Road is available, which accommodates cycling and walking to the benefit of local residents and visitors alike.
TT.1.93	The Applicant	**Sizewell Link Road -Traffic Analysis** Paragraph 3.2.64 [APP-450] states that Stage 4 consultation preferences were expressed for the D2 route as it was considered by respondents that this would have provided more of a legacy benefit, a safer route for HGVs, catered better for HGVs coming from the south, and reduced amenity impacts to villages. Provide more detail on the transport analysis in this respect for the alternative routes.
	Response by SZC Co. at Deadline 2	As explained in SZC Co's. response to **TT.1.91** of this chapter, the route selection exercise for the Sizewell link road was closely informed by an understanding of environmental factors. As explained there, background information on the route selection, including transport analysis as referred to in this question, has been compiled to assist the examination and is set out at **Chapter 4** of the **Sizewell Link Road: Principle and Route Selection Paper**, which is included at **Appendix 5D**.
	Response by Charles Macdowell, B1122 Action Group at Deadline 3	We believe that those Relevant Representations that state the poor level of legacy benefit from the proposed SLR route are comparing it with the alternative Route W North/ D2. The latter would reduce post-construction traffic through the villages on the B1122 by at least as much as the SLR. It would also provide a much better route to reach the several proposed energy projects west and south of Leiston, and would connect Leiston directly to the A12. This would have a positive employment effect on the town once the construction 'boom' has abated – a significant problem after the construction of Sizewell A and B.

ExQ1	Question to:	Question:
	Response by Stop Sizewell C at Deadline 3	See answer to TT.1.91 We agree with SCC that a route south of Saxmundham would be preferable, plus an appropriate approach to the 15% of travel from the north, e.g. sensitive use of adaptations to the B1122 – safety measures, speed limiting measures, road crossing facilities and so on.
	Response by SZC Co. at Deadline 5	SZC Co.'s response at Deadline 2 remains valid.
TT.1.94	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?
	Response by SZC Co. at Deadline 2	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.
	Response by Suffolk County Council at Deadline 3	For the traffic distribution south of SLR, the Applicant's response does not mention that D2 route would ease pressure on B1069 and B1119.

ExQ1	Question to:	Question:
	Response by Stop Sizewell C at Deadline 3	The Applicant states that 85% of HGVs would arrive at the SLR from the A12 South and 42% of buses would arrive at the SLR from the A12 south and that most workers in cars will go to the park and ride sites rather than travelling along the SLR Regardless of use of the SLR, about 61% of workers' vehicles and 73% of LGVs are assumed to be distributed on routes south of the SLR and A1120. A link road route to the south of Saxmundham would provide greater legacy value, and reduce rat-running between Leiston and the A12.
	Response by SZC Co. at Deadline 5	SZC Co.'s response at Deadline 2 remains valid.
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: (x) The works on the main development site are started in advance of all the mitigation projects being completed; and (xi) no mitigation is proposed on the existing B1122 to mitigate the increase in traffic during the early years other than highway maintenance.
	Response by SZC Co. at Deadline 2	(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.
	Response by Charles Macdowell, B1122 Action Group at Deadline 3	The ExA is absolutely right to point out the limitations of the Early Years strategy, which does not appear to deserve a section of the DCO application in its own right. This period will be exceedingly bad for the communities on the B1122. The applicant states that

ExQ1	Question to:	Question:
		"disruption caused by construction traffic using the B1122 is kept to a minimum" but has proposed no significant mitigation. This is simply not good enough. The applicant should be required to fund speed cameras and/or average speed systems, noise screening and vibration monitoring and pre and post surveys of vulnerable buildings.
	Response by Suffolk County Council at Deadline 3	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.
	Response by Stop Sizewell C at Deadline 3	We are tempted to quote the expression "your failure to plan is not my emergency" It is unreasonable for EDF to expect local communities to bear the burden of EDF's newfound urgency when they have taken so long to bring their DCO application forward. Stage 1 consultation started in 2012! Transport to the construction site rivals environmental damage and coastal concerns as one of the most important issues that the Applicant has needed to address during all the years of pre-application consultation. They have still not got it right. NB, in spite of the opportunity (i.e. not affecting construction period) there are no proposals to lay on buses for construction workers living within walking distance of services in the early years. This could be achieved without additional infrastructure.
	Response by SZC Co. at Deadline 5	At the Issue Specific Hearings 2 and 3 SZC Co. committed to providing the ExA with more detail on the movement of Sizewell C traffic on the B1122 in the early years of construction. This is included as part of SZC Co.'s **Written Submissions Responding to Actions Arising from ISH2** (Doc Ref. 9.49). SZC Co. continue to engage with SCC, ESC, Suffolk Constabulary and Highways England on the monitoring and control of Sizewell C traffic movements. An updated Construction Traffic Management Plan (CTMP) and Construction Worker Travel Plan (CWTP) is expected to be submitted at Deadline 6 which will respond to discussions at the Issue Specific Hearings 2 and 3 and subsequent engagement with the relevant authorities.

ExQ1	Question to:	Question:
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?
	Response by SZC Co. at Deadline 2	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.
	Response by Charles Macdowell, B1122 Action Group at Deadline 3	We support the proposals to overbridge the SLR on Pretty Road without a junction. We also support the requests by Interested Parties including Middleton Parish Council for a similar non-connecting underpass for Fordley Road.
	Response by Suffolk County Council at Deadline 3	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

ExQ1	Question to:	Question:
	Response by Stop Sizewell C at Deadline 3	Positive discussions about providing a bridge in response to objections are ongoing.
	Response by SZC Co. at Deadline 5	SZC Co. is grateful for the support expressed on the proposal to revise the Pretty Road bridge proposal so that vehicular access across the Sizewell link road in this location is maintained. SZC Co. has responded to requests by Interested Parties for a similar non-connecting underpass for Fordley Road in **SZC Co.'s Comments on Written Representations** at Deadline 3 [REP3-042] at pages 318 and 331. SZC Co.'s response at Deadline 3 remains valid.
TT.1.97	The Applicant	**Sizewell Link Road – Route for Abnormal Indivisible Loads (AIL)** Figure 2.4 [APP-449] suggest that AIL will use the Middleton Moor Link road to access the Sizewell Link Road. Explain: (xii) Why they will not use the whole length of the Sizewell Link Road; and (xiii) Will the new roundabout on the B1122 be designed to accommodate AIL?
	Response by SZC Co. at Deadline 2	(i) AILs to/from the A12 south will use the whole length of the Sizewell link road. AILs to/from the A12 north will use the A12/B1122 roundabout at Yoxford and the Middleton Moor link to access the Sizewell link road in order to avoid the need for AILs to travel along the A12 through Yoxford. (ii) Yes, the A12/B1122 roundabout design accommodates AIL movements.
	Response by Suffolk Constabulary at Deadline 3	The Applicant is reminded that Suffolk Constabulary's assistance will be required when AILs are required to contravene traffic regulations - which can include instances with AILs moving through the new junctions and link roads. Suffolk Constabulary will review the design criteria; dimensions; proposed operations; and constraints when considering a proposed adjusted AIL Management matrix for the "post-mitigation" position, which is proposed to be submitted by the Applicant following Deadline 3. The Constabulary will commit resources in accordance with agreements with the Applicant. This may be through business-as-usual operations or if dedicated additional resources have been funded. It should be noted by the Applicant and SCC that the proposed road layouts and the associated altered junctions on A12 and B1122 could impact on the management of AILs

ExQ1	Question to:	Question:
		not associated with SZC. This could impact on the business-as-usual operations of AILs and reduce the availability of that resource to respond to SZC's requirements.
	Response by SZC Co. at Deadline 5	The proposed highway infrastructure is being designed in accordance with DMRB standards and will be technically approved by Suffolk County Council as local highway authority. The highway infrastructure is being designed to accommodate AIL movements and therefore there is not expected to be any impact on the business as usual operations of AILs and the associated police resourcing. The proposed management arrangements for Sizewell C AILs is described in Chapter 7 of the **Construction Traffic Management Plan** [REP2-054]. SZC Co. continue to work with Suffolk Constabulary and SCC to agree AIL management arrangements.
TT.1.99	The Applicant	**Transport Assessment Addendum [AS-266] - Two Village Bypass** In the case of Little Glenham and Marlesford how will the traffic increases shown in these Tables be mitigated throughout the construction programme?
	Response by SZC Co. at Deadline 2	The **Deed of Obligation** (Doc. Ref. 8.17(C)) identifies a Marlesford and Little Glemham Improvement Contribution to be used by Suffolk County Council (SCC) for the design and implementation of local improvements to mitigate Sizewell C impacts. The potential improvements include new 30mph speed limit through Marlesford and extension of the existing 40mph speed limit, traffic calming, gateway features, new and wider footways and crossings. Discussions are ongoing with Suffolk County Council, East Suffolk Council and the parish councils, with a view to agreeing the proposed scheme.
	Response by Marlesford Parish Council at Deadline 3	The Applicant repeats the mitigation measures that have been discussed with Marlesford and Little Glemham (see AR.1.25 above) – our comments are included above. We would however ask that works to the A12 in Marlesford and Little Glemham be carried out early in the construction programme. This would provide the maximum potential benefit to the two villages and is likely to cause less congestion on the A12 than mitigation works that might be carried out closer to Peak.
	Response by SZC Co. at Deadline 5	Improvement works at Marlesford and Little Glemham are proposed to be delivered by Suffolk County Council as the highway authority for the road. The programme for delivery of these schemes would therefore need to be discussed and agreed with SCC.

ExQ1	Question to:	Question:
TT.1.102	The Applicant, Network Rail	**Northern Park and Ride, Darsham** Two RR's [RR-0244 and RR-0908] have raised the issue relating to the safety of the level crossing at the station. Their concern is based on Network Rail's classification of the crossing safety being exacerbated by the additional traffic. Has the impact of the proposed development on this level crossing safety been assessed and discussed with Network Rail?
	Response by SZC Co. at Deadline 2	The northern park and ride is located to the north of Darsham level crossing. The purpose of the park and ride is to intercept construction worker car trips and consolidate construction workers onto buses for the onward journey to the main development site. The majority of the Sizewell C traffic travelling through the level crossing would therefore be HGVs and buses. Drivers of HGVs and buses will undergo an induction and adhere to Driver Rules to ensure that they are fully aware of the potential dangers, prepared to stop at crossings and understand the warnings. Discussions are ongoing with Network Rail regarding the level of increased risk at this crossing and whether an intervention is required.
	Response by Network Rail at Deadline 2	As part of the high level review of level crossing impacts and risk analysis Darsham Park & Ride was identified as requiring intervention. This discussion is currently ongoing with options for mitigation including relocation of the station car park into the new facility or additional Full barrier installation. A Full barrier solution has interdependencies in terms of timeframe for delivery and cost of installation which need to be further reviewed and agreed between the parties. (See answer to Question HW.1.19)
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by Together Against Sizewell C at Deadline 3	What modelling of traffic patterns has been done in relation to the risk of "Blocking Back" over Darsham AHBC particularly at shift change times and on a summer Saturday in school holidays. The applicant states that "drivers of HGVs and buses will undergo an induction" but that completely misses the workers arriving/leaving the site in their own cars and the mass of the general public. Whilst there are "box Junction" markings on the crossing these are poorly understood and complied with generally. There exists the risk of a road vehicle stuck on the crossing being struck by a down train. Whilst the majority of

ExQ1	Question to:	Question:
		trains will already be braking to stop at Darsham station this does not apply to empty stock workings that could be travelling at 55 mph or a heavy engineering train travelling at 20 mph. The train drivers view of the crossing is limited, the line is on a left hand curve at this point and a shallow cutting with the Westleton Road bridge restricts the approach view.
	Response by SZC Co. at Deadline 5	**Appendix 9B** of the **Consolidated Transport Assessment** [REP2-050] describes a detailed traffic micro-simulation model (VISSIM) of the A12 between Yoxford and the A144 junction, including the A1120 and B1122 approaches to the A12. This model includes the effect of the A12 level crossing near Darsham and the B1122 level crossing. The appendix reports queue lengths but does not identify any risk of blocking over the level crossings. In addition, the proposed location of the northern park and ride to the north of the level crossing will enable the majority of worker car trips allocated to the northern park and ride to be intercepted north of the level crossing and thereby reduce worker cars travelling over the level crossing.
TT.1.104	The Applicant	**Southern Park and Ride, Whickham Market** Explain why the existing layout on A12 northbound carriageway would be changed from two lanes to one lane before the northbound slip road from the B1078 joins the A12?
	Response by SZC Co. at Deadline 2	The northbound on slip road joins the existing A12 where the two lanes of the dual carriageway reduce to a single lane north of the Wickham Market bypass. There are effectively three lanes merging into one, which is a road safety concern. Notwithstanding this, there has only been one slight collision in the five-year period reported in the **Transport Assessment** (Doc Ref. 8.5(A)) [AS-017]. However, given the increased traffic volume due to Sizewell C on the A12 and additional buses from the southern park and ride facility using the slip road, the SZC Co. highway measures propose to mitigate traffic impacts and reduce the likelihood of additional collisions at this location. The Stage 1 Road Safety Audit, included in **Appendix 10A** of the **Transport Assessment** [AS-017], considered the lane reduction proposals and did not raise any safety concerns with the proposed change from two to one lane before the northbound slip. In paragraph 869 of their response to Stage 3 consultation, Suffolk County Council indicated that subject to detailed design, swept path assessment, capacity assessment and road safety audit, the highway proposals would be acceptable.

ExQ1	Question to:	Question:
	Response by Marlesford Parish Council at Deadline 3	The answer given by the Applicant is accepted by MPC. We would point out however that by reducing from two lanes to one to allow traffic on the northbound slip-road to join the A12, there will be inevitable delays as northbound traffic on the A12 merges before the slip road joins. We believe that this will add to the congestion as traffic enters Marlesford from the south and we do not believe that its effects have been fully appreciated by either SCC or the Applicant. It is a further reason why a Four Village Bypass delivered now would be the most appropriate solution.
	Response by SZC Co. at Deadline 5	See responses to Al.1.16 and TT.1.45 in as they relate to MPC's comment on a four village bypass. Also, see response to TT.1.99 for discussion on potential improvements at Marlesford.
TT.1.109	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?
	Response by SZC Co. at Deadline 2	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

ExQ1	Question to:	Question:
		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.
	Response by Highways England at Deadline 2	Highways England awaits the applicant's response to ExA and will comment/respond if necessary by the 24th June deadline.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by Suffolk County Council at Deadline 3	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.

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 5	The location of the freight management facility was discussed at ISH2 and SZC Co. position is summarised in SZC Co.'s written summary of SZC Co.'s oral submission of ISH2 (Doc Ref 9.42).
TT.1.110	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.
	Response by SZC Co. at Deadline 2	(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.
	Response by Highways England at Deadline 2	Highways England awaits the applicant's response to ExA and will comment/respond if necessary by the 24th June deadline.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.

ExQ1	Question to:	Question:
	Response by Suffolk County Council at Deadline 3	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.
	Response by SZC Co. at Deadline 5	SZC Co. continue to engage with SCC, ESC, Suffolk Constabulary and Highways England on the monitoring and control of Sizewell C traffic movements. An updated **Construction Traffic Management Plan** (CTMP) is expected to be submitted at Deadline 6 which will respond to discussions at the Issue Specific Hearings 2 and 3 and subsequent engagement with the relevant authorities.
TT.1.112	The Applicant	**ES CHAPTER 10 [APP-198] – TRANSPORT** Paragraph 10.2.23 states that "For peak construction the representative hour was initially identified as 22:00- 23:00 when 'daytime hours' of 07:00-23:00 were considered. Given the assessments are to primarily assess impact on vulnerable road users, it is important that the representative hour is a reflection of when vulnerable road users are likely to be on the network. As such, the representative hour for peak construction has been taken to be 07:00-08:00". Explain why this "representative" hour was chosen if it is meant to be a period when vulnerable road users are on the network.

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 2	Guidance on hours or periods to assess is set out in paragraphs 2.8 and 3.10 of the Institute of Environmental Management (IEMA) Guidance[16]. Paragraph 2.8 of the guidance[17] states: *"In preparing an Environmental Statement it is considered that the documentation should enable significantly affected people, parties or interests to be able to identify the "worst" environmental impact that might reasonably be expected, in addition to how they would be affected by the average or typical conditions. This issue is returned to in paragraph 3.10 of these Guidelines. "Worst" environmental impacts are likely to include the effect of "greatest change" as well as "highest impact."* Paragraph 3.10 of the guidance[18] states: *"The detailed assessment of impacts is therefore likely to concentrate on the period during which the absolute level of an impact is at its peak, as well as the hour at which the greatest level of change is likely to occur. Special attention should also be given to periods which may be considered to be especially sensitive, such as night-time noise."* The guidance[19] focuses on the environmental effects of increases in traffic on roads, which includes the transport impacts assessed in **Volume 1, Chapter 2** of the **ES Addendum** [AS-181] (e.g. severance, pedestrian delay etc) as well as other impacts such as noise and vibration and dust and dirt. Therefore, the guidance in paragraph 2.8 and 3.10[20] needs to be considered against the transport impacts that have been assessed in **Volume 1, Chapter 2** of the **ES Addendum** [AS-181] and the criteria for that assessment. The assessment of severance, pedestrian delay, amenity and fear and intimidation is based on percentage / actual change in traffic flows. Therefore the hour of greatest change in traffic flow has been assessed (i.e. representative hour) and for all other hours of the day, the impact on these aspects will be less. The average or typical level of impact

[16] Institute of Environmental Management and Assessment (IEMA) (1993). The Guidelines for the Environmental Assessment of Road Traffic.
[17] Institute of Environmental Management and Assessment (IEMA) (1993). The Guidelines for the Environmental Assessment of Road Traffic.
[18] Institute of Environmental Management and Assessment (IEMA) (1993). The Guidelines for the Environmental Assessment of Road Traffic.
[19] Institute of Environmental Management and Assessment (IEMA) (1993). The Guidelines for the Environmental Assessment of Road Traffic.
[20] Institute of Environmental Management and Assessment (IEMA) (1993). The Guidelines for the Environmental Assessment of Road Traffic.

ExQ1	Question to:	Question:
		on severance, pedestrian delay, amenity and fear and intimidation has also been undertaken based on average weekday traffic flows. There is no need to assess the hour of highest absolute level of impact for severance, pedestrian delay, amenity and fear and intimidation (i.e. when the total Reference Case + Sizewell C traffic is at the combined highest level) as, unless this hour coincides with the hour of greatest change (i.e. representative hour) the assessment of the hour of absolute level of impact would result in lower impacts on vulnerable road users than the representative hour. Likewise, given that the assessment is based on changes in traffic levels and not levels of vulnerable users, the assessment of the hour of greatest change (i.e. representative hour) provides the greatest level of impact that any vulnerable road user would experience during the day. If the effect on vulnerable road users is assessed to be not significant in the hour of greatest change in traffic flows (i.e. representative hour), then the effect would be not significant in all other hours of the day that vulnerable road users are likely to use the network (including the hour of highest environmental impact) as the percentage change in traffic would be less in those hours. The exception to this is for the links that have been assessed within **Volume 1, Chapter 2** of the **ES Addendum** [AS-181] to have a significant adverse effect based on the representative hour but the effect has been considered to be not significant as the representative hour did not coincide with the hour of highest environmental impact (e.g. at the start/end of the school day). In these small number of cases, an assessment of the hour of highest environmental impact should have been undertaken and has been included in a note at **Appendix 24D** of the written responses. With regards to other transport aspects that are assessed within **Volume 1, Chapter 2** of the **ES Addendum** [AS-181] (i.e. driver delay and road safety), the assessment was based on the **Transport Assessment Addendum** [AS-266]. The **Transport Assessment Addendum** [AS-266] has assessed the impact on driver delay for a number of modelled hours, which include the development peak hour and the hour of highest absolute impact (i.e. when the total Reference Case + Sizewell C traffic is at the combined highest level). The assessment of driver delay is not based on percentage change in traffic but traffic modelling of the effects of increased traffic on driver delay.

ExQ1	Question to:	Question:
		The assessment on the effect on road safety is based on the Department for Transport's cost benefit analysis light touch (COBALT) methodology to assessing the impact on road traffic collisions as a result of increases in traffic. The assessment is based on 24 hour daily flows as this is what is required by the COBALT assessment. In summary, it is considered that the assessment within **Volume 1, Chapter 2** of the **ES Addendum** [AS-181] accords with the guidance on assessment hours and periods set out in the IEMA Guidance[21]. The exception to this is a small number of cases where the hour of greatest environmental impact should have also been assessed. This further assessment is included in **Appendix 24D** of the written responses.
	Response by Stop Sizewell C at Deadline 3	Applicant refers to IEMA guidance in which the environmental impacts are considered, based on periods of 'greatest change' in traffic flows, since these periods would have the greatest impact on any VRUs. Other times when VRUs are present would have lower traffic volumes unless there is coincidence of timing. Stop Sizewell C argues that in the early years construction traffic on the com (and other minor roads in the locality) would result in significant damage to residential amenity, pollution and dangerous conditions for all road users at all times; not only periods of 'greatest change'
	Response by SZC Co. at Deadline 5	The ES assessment is being actively discussed with SCC and ESC, and all parties are working towards agreement on the assessment methodology and results. Significant progress has been made recently and the revised assessment is expected to be issued to the Examining Authority at Deadline 6.
TT.1.114	The Applicant	**ES CHAPTER 10 [APP-198] – TRANSPORT** Paragraph 10.6.8 sets out that screening has been undertaken using 24hr AAWT. In the IMEA Guidance Paragraph it acknowledges that, "for many impacts such as noise and severance it is considered that average or total daily traffic flows provide insufficient information for any real understanding of environmental effects." Understanding this, what are the implications for the screening process if the hours of greatest change or the hours of greatest impact are used on the screening?

[21] Institute of Environmental Management and Assessment (IEMA) (1993). The Guidelines for the Environmental Assessment of Road Traffic.

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 2	The screening in **Volume 1, Chapter 2** of the **ES Addendum** [AS-181] has been based on 24 hour AAWT. The IEMA guidance does not specify whether the screening should be based on daily traffic flows or hourly flows. However, when providing reasoning for the screening thresholds, the IEMA guidance refers to daily flows within paragraph 3.16, which states *"It should also be noted that the day-to-day variation of traffic on a road is frequently at least some + or -10%".* Given this, it was decided to base the screening process on the 24 hour AAWT flows. SCC and ESC have provided comments on the transport environmental assessment included in **Volume 1, Chapter 2** of the **ES Addendum** [AS-181]. Further work is ongoing by SZC Co. to address SCC's and ESC's comments on the assessment. SZC Co. will include additional screening as part of that work based on the representative hour. A technical note will be submitted to the Examination summarising the further assessment that is being undertaken as part of the Statement of Common Ground discussions with the local authorities.
	Response by Stop Sizewell C at Deadline 3	What is the detail of the additional screening proposition? This would not address the issue of early years while construction vehicles are using the B1122 and there is a new road being built behind these settlements. The longevity of the construction project will make this issue intolerable for communities. Please note that currently the Noise Mitigation Scheme is not available for homes on the B1122.
	Response by SZC Co. at Deadline 5	See SZC Co.'s Deadline 5 response to TT.1.112.
TT.1.118	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
	Response by SZC Co. at Deadline 2	Refer to response to question **TT.1.95**.
	Response by Suffolk County Council at Deadline 3	SCC is committed to further discussions with the Applicant on this matter, as per TT.1.95 above.

ExQ1	Question to:	Question:
	Response by Stop Sizewell C at Deadline 3	Response TT.1.95 But note: the impacts including safety will still be felt in the first three years when at the current time people find the B1122 "difficult to cross" (source: ES vol 6 Ch 3). Alongside proposed maintenance, the minimum intervention should include sight line improvements, footway extensions and crossings as described in the ES.
	Response by SZC Co. at Deadline 5	See SZC Co.'s Deadline 5 response to TT.1.95.
TT.1.120	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?
	Response by SZC Co. at Deadline 2	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** [APP-198]. 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.
	Response by Suffolk County Council at Deadline 3	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).
	Response by SZC Co. at Deadline 5	See SZC Co.'s Deadline 5 response to TT.1.112.
TT.1.123	The 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?

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 2	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.
	Response by Suffolk County Council at Deadline 3	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).
	Response by SZC Co. at Deadline 5	See SZC Co.'s Deadline 5 response to TT.1.112.
TT.1.125	The 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.
	Response by SZC Co. at Deadline 2	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.
	Response by Suffolk County Council at Deadline 3	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

ExQ1	Question to:	Question:
		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.
	Response by SZC Co. at Deadline 5	SZC Co. continue to engage with SCC, ESC, Suffolk Constabulary and Highways England on the monitoring and control of Sizewell C traffic movements. An updated Construction Traffic Management Plan (CTMP) and Construction Worker Travel Plan (CWTP) is expected to be submitted at Deadline 6 which will respond to discussions at the Issue Specific Hearings 2 and 3 and subsequent engagement with the relevant authorities.
TT.1.126	The Applicant	**ES ADDENDUM [AS-181] – Fear and Intimidation 2028 Peak Construction Busiest Day** Paragraph 2.5.67, Link 26 A12 Marlesford given an increased and significant effect has been identified is the Applicant proposing any mitigation?
	Response by SZC Co. at Deadline 2	Yes. Mitigation is proposed at Little Glemham and Marlesford, to be secured via an obligation in the **Deed of Obligation** (Doc. Ref. 8.17(C)). See response to question **TT.1.99** of this chapter.
	Response by Marlesford Parish Council at Deadline 3	The Applicant confirms that mitigation is proposed for Marlesford and Little Glemham (see AR.1.25 above). We will continue to engage with the Applicant and would repeat the MPC comments made in TT.1.99 above.
	Response by SZC Co. at Deadline 5	No further comment required from SZC Co.
TT.1.128	The 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?
	Response by SZC Co. at Deadline 2	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]:

ExQ1	Question to:	Question:
		*"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.
	Response by Suffolk County Council at Deadline 3	As per our response to TT.1.82, SCC disagrees with the Applicant's conclusion on the significance of impact on this corridor.
	Response by SZC Co. at Deadline 5	See SZC Co.'s Deadline 5 response to TT.1.61.
TT.1.132	The 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
	Response by SZC Co. at Deadline 2	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

ExQ1	Question to:	Question:
		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**.
	Response by Suffolk County Council at Deadline 3	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.
	Response by Stop Sizewell C at Deadline 3	SZC proposes [instead] the construction of the link road. The impacts of construction traffic would occur from the early years and this will add traffic in Theberton and other communities, affecting the safety of vulnerable road users, creating intimidation and impacting quality of life. Three years is a long time for an older retiree to wait for what are, in fact, fairly basic, low cost and quickly implemented facilities that should reasonably be provided in advance of all construction works.
	Response by SZC Co. at Deadline 5	See SZC Co.'s Deadline 5 response to TT.1.112.
Chapter 25 - W.1 Waste (conventional) and material resource		
W.1.2	Essex and Suffolk Water Company	**Water Supply Strategy Appendix 2.2D [AS-202]** Provide an update on the delivery of water supply to the Proposed Development and the expected delivery timescales.
	Response by SZC Co. at Deadline 2	No response from SZC Co. is required.

ExQ1	Question to:	Question:
	Response by Northumbrian Water Limited (NWL) (Trading as Essex and Suffolk at Deadline 2	Extract from the Response by Northumbrian Water Limited (NWL) (Trading as Essex and Suffolk: *"In summary:* *i. We are currently undertaking work to understand how a mains water supply solution to SZC would be configured and delivered;* *ii. There are a number of considerations including: a. the timely delivery of NWL's own capital programme; and b. the outcomes of our WINEP abstraction sustainability investigations.* *iii. We are working with SZC Co to understand how the timing of the supply of mains water to SZC would interrelate with our capital programmes.* *iv. On an indicative basis only, NWL consider that it may be possible to deliver the scheme by September 2024 at the earliest. This projection is however subject to additional ongoing work.* *v. We are currently preparing a supply profile to confirm what water we might be able to supply between April 2022 and September 2024. Further work streams are expected to be available in June and August 2021 in this respect."* Please refer to [REP2-158] for full response.
	Response by SZC Co. at Deadline 3	SZC Co is continuing to work closely with NWL both in relation to resource availability and proposed water transfer scheme, including timescales for making the necessary connections. The outcome of the above studies will inform the Water Supply Strategy for the Sizewell C Project that SZC Co will submit into the examination at Deadline 5.
	Response by Suffolk Coastal Friends of the Earth at Deadline 3	Refer to REP3-134 for full response. In summary, in the undesirable event of the Sizewell C project going ahead • The mains water supply cannot be obtained from local resources • it would be an unacceptable planning impact to allow it to take this level of water away from local people, businesses and farms, and so the water supply infrastructure must be in place first • the start of enabling works must therefore be delayed until the pipeline is built, and supplying water in the required quantity, quality and reliability to ensure the project can be built and operated safely.

ExQ1	Question to:	Question:
		• the pipeline will be approximately 300 miles long, and include pumping works and other associated infrastructure • This means a delay of at least two and a half years to the Sizewell C project, compared to the Applicant's proposed timetable.
	Response by Together Against Sizewell C at Deadline 3	Refer to REP3-144 for full response.
	Response by SZC Co. at Deadline 5	SZC Co. comments at Deadlines 2 and 3 remain valid.