



The Sizewell C Project

9.43 Written Summaries of Oral Submissions made at ISH3: Traffic and Transport Part 2 (8 July 2021)

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1 ISSUE SPECIFIC HEARING 3: TRAFFIC AND TRANSPORT (PART 2)

1.1 Introduction

1.1.1 This document contains the Applicant's written summaries of the oral submissions made at Issue Specific Hearing 3 (ISH3) on Traffic and Transport (Part 2) held on 8 July 2021.

1.1.2 In attendance at ISH3 on behalf of the Applicant was:

- Hugh Flanagan of Francis Taylor Building (Counsel);
- Kirsty McMullen of KMC Planning Ltd (Transport Planning Lead);
- John Rhodes of Quod (Planning Manager (Strategic));
- Richard Bull of SZC Co. (DCO Programme Manager);
- John Davies of Ideachain Ltd. (Site Operations & Logistics Programme Lead);
- Carly Vince of SZC Co. (Chief Planning Officer).

1.1.3 Where further information was requested by the Examining Authority (ExA) at ISH3, this is contained separately in the Applicant's **Written Submissions Responding to Actions Arising from ISH3** (Doc Ref. 9.50).

1.2 Agenda Item 3: Monitoring and control mechanisms for Traffic and Transport

Early Years controls in the DCO

1.2.1 Ms McMullen on behalf of the Applicant explained the definition of, and the controls applicable to, the early years in response to a question from the ExA. She explained that in the **Construction Traffic Management Plan** (CTMP) [REP2-054] at paragraph 4.4 the early years is defined as a period of time prior to the delivery and availability of the Sizewell Link Road (SLR) and the Two Village Bypass (TVBP). In that period, the control applies that there can be no more than 600 two-way HGV movements per day. After that, for the remainder of the construction phase, a cap of 700 two-way HGV movements applies. In the **Construction Worker Travel Plan** (CWTP) [REP2-055] at paragraph 3.4, the early years is defined as the period prior to the delivery of the northern or southern park and ride facilities. In that

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period, the control is provided by the early years' mode share targets. Afterwards, there is a change to the peak construction mode share targets.

- 1.2.2 In the **CTWP** [REP2-054], the commitment is based on mode-share targets, not number of vehicles, but Table 3.1 in the **CWTP** [REP2-055] makes clear that it is not possible to achieve the mode share targets without the AD infrastructure. The purpose of that infrastructure is to manage trips to site. There is also a limit on parking spaces which creates a cap in that respect.
- 1.2.3 The Transport Review Group (TRG) has the ability to impose or to require the Applicant to fund remedial measures in order to meet those targets. It is a very strong commitment and the level of walking and cycling is very high, nearly one third. Another third is by park and ride. That cannot be achieved without those facilities.
- 1.2.4 Mr Flanagan, Counsel for SZC Co., added that there were suggestions from other parties that everything that had been assessed should be controlled. There is no basis for that approach. Neither law nor policy requires the imposition of controls or monitoring on a project simply to ensure that a project conforms precisely with the outputs of the assessments undertaken at the application stage. An assessment does not automatically translate into multiple controls in this way. Rather, the policy test for the imposition of obligations is contained in paragraph 4.1.8 of NPS EN-1. This means that it must be asked whether it is necessary to provide a control to make the development acceptable in planning terms. Controls may be necessary to avoid harm, but the justification must be identified.
- 1.2.5 There is no basis to say that a development should be constrained to operate precisely as has been assessed in all respects, which would not be realistic in any event. The management plans provide a framework of controls within which the Project must operate – but how the project is managed to stay within those limits must be a matter for SZC Co..
- 1.2.6 That is consistent with Government policy of not seeking to impose unnecessary burdens on developers. The onerous nature of the additional controls and monitoring sought by SCC, particularly given the scale and length of the construction phase, should not be underestimated. They would come on top of the significant challenges presented by the delivery of a very large and complex infrastructure project. Further, it is infrastructure of national significance for which there is an urgent need. This weighs heavily against controls other than those that can be robustly justified.
- 1.2.7 In response to the ExA's query as to whether vehicle movements needed to be controlled further, Counsel for SZC Co. observed that any such controls must be considered against the relevant tests. There is no dispute

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that controls on HGV movements are reasonable because of the impacts they create and the particular sensitivity of the B1122, but it does not at all follow that a control should be imposed in respect of every vehicle movement. That would be a wholly novel approach. For example, just down the road the Brightwell Lakes development of some 2,000 homes plus significant employment floorspace has recently been granted permission. The transport assessment for that development no doubt assessed very significant numbers of vehicle movements on the same network with which this examination is concerned, yet no vehicle number controls at all were imposed on that permission.

- 1.2.8 First, controls are imposed via parameter plans to align with the development assessed in the environmental assessment. Secondly, controls are imposed to avoid harm. Understood in that context, controls on all vehicle movements are not justified.
- 1.2.9 The consequences of imposing controls also need to be considered. There is an urgent need for this project and if unnecessary controls are imposed, that conflicts with the policy imperative of urgency, because it means that if there is a risk of exceeding a cap then the project must stop and/or a change must be applied for, which can be a time-consuming process. The context of urgency brings into focus the importance of only imposing strictly necessary controls.
- 1.2.10 Mr Rhodes added that it is important to be clear that what is being proposed is already a strict regime of control. So, for example, the **CTMP** [REP2-054] contains absolute limits not only on numbers of HGVs but also on times, routes and on peak hours. In relation to other construction and workforce traffic there are limits on car parking. Then the **CTMP** [REP2-054] and **CWTP** [REP2-055] contains multiple measures to address the impacts and which the Applicant is committing to. It might be technically possible to find some form of control for every measure and every step – cycling, bus, park and ride – but the control over worker numbers is intended to be achieved through the parking limits and the mode share target, which will achieve what is required. There seems to be some misunderstanding that those controls are not enforceable or may be exceeded.
- 1.2.11 The way in which the TRG is to operate means that there is an uncapped obligation on the Applicant to meet the mode share targets. The obligation through the **Deed of Obligation** (DoO) (Doc Ref. 8.17(E)), the **CTMP** [REP2-054], the **CWTP** [REP2-055] and the governance of the TRG is that the Applicant has to produce what is effectively a rolling action plan to demonstrate how the targets will be met and to show that they are being met. The TRG can require corrective action to be taken if it appears likely that the targets will not be met or if they are not being met. That is an

uncapped liability for the Applicant. The significance of this should not be underestimated.

- 1.2.12 As Ms McMullen explained, the Applicant cannot achieve the walk/cycle mode share target unless the Applicant provides the walking and cycling improvements. The Applicant cannot achieve the car and park and ride targets unless the Applicant provides the caravan park, the accommodation campus and the park and rides. The Contingent Funds then provide a further mechanism for remedying impacts if necessary. The TRG regime has worked well at Hinkley Point C (HPC) and no enforcement has been necessary, which is important evidence to support the approach taken. At Hinkley it was untried but now it has been tried and tested.
- 1.2.13 In response to the scenario posed by the ExA of some delay in the delivery of mitigating infrastructure, Mr Rhodes accepted that in that scenario the impacts could last for longer but they would not be greater because the controls would still apply. But in any event Mr Rhodes stated that the Applicant would seek to provide more detail on the construction programme and the way in which the mitigation would be effective. *[SZC Co. has submitted this in detail as part of its **Written Submissions Responding to Actions Arising from ISH1** (Doc Ref. 9.48).]*
- 1.2.14 In response to a question from the ExA, Mr Rhodes explained that the TRG is balanced with three members appointed by the Applicant and three from the local authorities and Highways England. At HPC it has been a very collaborative, cooperative and effective regime that arrives at the right answers based on real time information. As to suggestions that there could be deadlock, Mr Rhodes explained that agreement is reached on the basis of everyone trying to achieve the same thing, and there is the ability to escalate it to Delivery Steering Group (DSG) if necessary.
- 1.2.15 At HPC, there was a need to build an alternative park and ride because of issues delivering the planned one caused by the delay in FID, but that is evidence of the process working. It was because of the controls and limits that it was absolutely necessary to find a solution. The limits could not be and were not broken; they required another approach to be consented. The evidence of that parallel process and it working in practice at HPC is important.
- 1.2.16 In response to Mr Bedford's observation that the controls sit in the **DoO** (Doc Ref. 8.17(E)) not the **DCO** (Doc Ref. 3.1(D)), Counsel for SZC Co. observed that the controls are properly secured through the **DoO**, which requires compliance with the **CTMP** [REP2-054] and **CWTP** [REP2-055] and the limits with them. That is strict control and the Applicant considers it is best located in the **DoO** and the **CTMP** and **CWTP**, because the controls

are linked to the TRG and its remedial powers, and the basis for the TRG and its operation is in the **DoO**. The constitution and governance of bodies like the TRG better sit in the **DoO** rather than **DCO** requirements.

- 1.2.17 In response to a question from the ExA, Counsel for SZC Co. confirmed that if the Applicant did not comply with the controls to which it is committing itself through the **DoO** (Doc Ref. 8.17(E)), the **CTMP** [REP2-054] and the **CWTP** [REP2-055], then an injunction could be applied for against the Applicant, which is a very effective and powerful enforcement mechanism. It could be a positive or negative injunction - both would be options. The Applicant does not consider SCC's suggestion of including the control in a DCO requirement is preferable or necessary. There is of course the possibility of criminal prosecution for breach of a DCO requirement, but that is inevitably a slower process than an injunction and a much less practical control than SZC are proposing.
- 1.2.18 Regarding the extent of the HGV cap and Mr Bedford's point about the B1122, Counsel for SZC Co. and Ms McMullen explained that the line would be drawn to include the B1122 in the HGV movement cap. This would be done by having the geo-fence at an appropriate point on the B1122 to capture and control those movements. It would be a cordon essentially. As to the GPS system, it is something committed to through the **CTMP** [REP2-054] and although it has not been procured yet its requirements are specified and the Applicant is having detailed discussions with potential suppliers. The majority of HGVs already have GPS which the system can connect with and although smaller supply chain operators may not, there is the option of a smartphone app that could allow integration and provide a solution. Mr John Davies also on behalf of the Applicant explained that there will be a bespoke feed into the DMS, which is done via an Application Programming Interface (API). If a HGV turned up which was not in the DMS it would not get on site.
- 1.2.19 In response to a question from Mr Collins, Counsel for SZC Co. confirmed that the park and ride in the early years is at the LEEIE. As to the definition of the Main Development Site (MDS) and a query from the ExA, Ms McMullen confirmed that when talking about the MDS she was including the LEEIE within that, although she would take away an action point to check the approach taken in the DCO with colleagues.
- 1.2.20 In response to a question from Mr Galloway with regards to a total of 5,000 parking spaces within the DCO, Ms McMullen explained that 1,000 parking spaces were sought at the MDS, and 1,250 at each of the northern and southern park and rides, which amounts to 3,500. Ms McMullen agreed to set out the position on parking in writing.

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- 1.2.21 In response to a query from Mr Collins, Ms McMullen confirmed that the controls and tracking applied to Sizewell C HGVs only, not Sizewell B vehicles or any other existing HGVs on the network.

The Transport Review Group

- 1.2.22 In response to questions from the ExA about the TRG, Counsel for SZC Co. confirmed that it would be chaired by SCC but there was no casting vote procedure as the composition and approach was deliberately balanced and collaborative. If things could not be resolved by discussion, then matters could be escalated to the Delivery Steering Group (DSG). With reference to the DSG's ability to resolve disputes, Counsel for SZC Co. referred the ExA to paragraph 3.5.3 of Schedule 17 of the **DoO** (Doc Ref. 8.17(E)), although in light of a comment made by Mr Tait for ESC as to the scope of the DSG's power which the drafting of that paragraph allowed for, Counsel for SZC Co. said that the Applicant would look again at the drafting. Beyond the DSG, there is the dispute resolution procedure by an appointed expert in clause 8 of the **DoO**.
- 1.2.23 Mr Rhodes explained that the experience at HPC had been collaborative and successful. The Applicant did not consider a casting vote appropriate because the powers of the TRG were wide, including imposing a potentially uncapped liability on the Applicant to spend very significant sums of money or take any action to remedy issues or stay within the limits committed to. Giving a casting vote to SCC could be akin writing a blank cheque in that respect. Counsel for SZC Co. noted that although Mr Bedford queried whether the TRG's remedial powers were limited to requiring expenditure from the Contingent Funds 1 and 2, in fact the powers were wider as indicated in paragraph 3.5.1 of Schedule 16 in particular, whereby sufficient mitigation had to be identified and approved by the TRG to remedy any likely or existing **CTMP** [\[REP2-054\]](#) and **CWTP** [\[REP2-055\]](#) breaches. This is also seen in the **CTMP** [\[REP2-054\]](#) at paragraph 9.4.6 whereby if the TRG reasonably considers that further corrective actions are required, and SZC Co have not submitted a proposal for corrective action, then SCC or Highways England will be invited to do so. Accordingly, the Applicant does not consider what SCC is proposing meets the tests in the NPS at paragraph 4.1.8, which requires development consent obligations to be reasonable and fair. That said, in response to a request by the ExA for the Applicant to explore if there could be a mutually acceptable form of wording on the TRG in dialogue with SCC, the Applicant said that it would take that away.
- 1.2.24 As to the responsiveness of the TRG, the governance provided for monthly meetings for the first three months of construction then quarterly meetings thereafter, but it could agree to meet more often if necessary. The **CTMP**

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[[REP2-054](#)] at paragraph 8.2.3 also obliged the Applicant to monitor the DMS on a daily basis against the requirements of the **CTMP** and to notify the TRG of any breaches as and when they occur, in order that issues would be identified at an early stage and dealt with promptly. There is no reason why the TRG could not put in place measures for urgent referrals if required. The intended SZC Co community helpline as mentioned at paragraph 9.5.9 of the **CTMP** would also assist in this regard. In response to a suggestion from the ExA, Counsel for SZC Co. and Mr Rhodes said that the Applicant would take away and consider how further clarity and comfort as to the TRG's responsiveness could be provided. *[SZC Co. has submitted this in detail as part of its **Written Submissions Responding to Actions Arising from ISH3** (Doc Ref. 9.50).]*

- 1.2.25 As to police involvement, Mr Rhodes stated that while it was not considered appropriate or necessary for the police to have voting rights on the TRG, police involvement was certainly envisaged as necessary, which could include attendance. The police would certainly not be marginalised in the process. The police will also be members of the Community Safety Working Group, the Applicant is agreeing a fund for additional police resources and generally a very close working relationship with the police is envisaged.
- 1.2.26 In response to questions by Interested Parties about the transparency of the TRG, Ms McMullen referred to Figure 2.1 in the **CTMP** [[REP2-054](#)] which showed how the other groups feed into the TRG, for example the Parish Councils and the Community Safety Working Group, such that there is liaison with the community in that way. There is also the intended SZC Co. community helpline as mentioned at paragraph 9.5.9 of the **CTMP**. There will be publicly available TRG monitoring reports and it is intended that meeting minutes and agendas will be available on the ESC website as at HPC. So although it was not proposed for the public to attend TRG meetings, there is communication and people's voices will be heard by the TRG. Mr Bull also explained that the Applicant has a very active Communications Office and there was already significant and ongoing engagement with the Parish and Town Councils, which would continue.
- 1.2.27 Mr Rhodes explained that there is provision in the **DoO** (Doc Ref. 8.17(E)) for Community Groups and although the drafting is not yet worked up, the Applicant is in active discussion with the Councils as to what is the best way off structuring that group. Ms Carly Vince for the Applicant explained that the Applicant has maintained dialogue with the communities prior to the application going in through the community forum, and on a more bespoke approach with the Parish Councils. Ms Vince explained that drafting regarding Community Groups will be put in the **DoO**, and in a request by the ExA Ms Vince said that this would be done by Deadline 6 (6 August).

- 1.2.28 In response to a query from Mr Brown as to the TRG's role in respect of monitoring rail freight movements, Ms McMullen stated that there is liaison between Network Rail and the highway authorities, and the Applicant would as requested by the ExA take away as an action whether that needed to be strengthened in the management plans.

Light Goods Vehicle (LGVs)

- 1.2.29 Ms McMullen explained that there are two types of LGV in the assessment. First, the LGVs going through to the site. In addition, there are LGVs associated with the postal consolidation facility at Wickham Market. The Applicant is not proposing management measures for LGVs for various reasons, including that they are generally not new trips on the network, and further because they are making multiple trips to multiple places it is contractually very difficult to control them. But there would be a signage strategy directing such traffic to use the same routes as the HGVs. LGVs going to site would be monitored through the DMS booker system, so the Applicant would know on a daily basis how many LGVs are routing to site and associated with Sizewell C and that monitoring data is proposed to be provided to the TRG. As to whether to track the LGVs, the definition of HGVs for monitoring purposes is 3.5 tonnes or above, which means that larger LGVs would actually be classified and tracked as HGVs. That is a form of mitigation. Further, LGVs have been modelled with route choice, and the assessment has found the effect to be acceptable, such that tracking is not required.
- 1.2.30 In response to a question from the ExA, Ms McMullen confirmed that it would be in the TRG's gift if considered necessary to require tracking of LGVs via a mobile phone app, as a demand management measure, although it is not envisaged that it will be necessary.
- 1.2.31 As to a request from SCC for quarterly caps, Mr Rhodes referred back to the discussion of the HGV profile in ISH2 and the risks which the Applicant saw in trying to hug the profile too tightly, because allowance needs to be made for the fact that things will change. However, the Applicant is taking this away and considering further whether quarterly caps are appropriate or useful. Care also needs to be taken because tightening controls on HGVs might lead to pressure elsewhere, for example a need for trains six days per week, such that a balance needs to be struck.
- 1.2.32 As to the ExA's question as to whether AD sites should be included in a cap of some description, Mr Rhodes stated that the Applicant, while recognising the sensitivity on the B1122, did not consider it necessary to cap everything, and unnecessary caps could have adverse consequences in removing flexibility, necessitating a change application, and thereby delaying an

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urgent project. Ms McMullen added that in the next version of the **CTMP** [REP2-054] it is proposed to track the HGV movements going to the AD sites so that compliance with the HGV routes can be monitored. The ExA asked whether a cap was necessary in the early years to protect Farnham and Wickham Market and Ms McMullen agreed to consider that.

1.2.33 Mr Davies further explained that tracking worker car movements was very challenging from an employment law and practical perspective. The ExA asked that Mr Davies provide a written response on this point at Deadline 5, which the Applicant confirmed they would do.

1.2.34 In response to a question from Mr Merry for SCC regarding whether the HGV movements taking spoil from the AD sites to the MDS in the early years were accounted for in the cap, and a follow up request from the ExA to set out a fuller explanation of the geofence on the B1122, Counsel for SZC Co. stated that the Applicant would take this away.

Construction Worker Travel Plan

1.2.35 In response to a comment by Mr Tait for ESC, Mr Rhodes on behalf of the Applicant disputed the need for any requirement for the accommodation campus to be in place by any trigger point. The campus is something that the Applicant needs to do and there is the obligation to use reasonable endeavours to deliver it in accordance with the **Implementation Plan** [REP2-044]. It is not impossible that the campus could be phased and the Applicant would be very happy to discuss that further with the Council. But given that the Council want the Applicant to optimise home based workers it is not clear that racing to complete the campus faster, even if practical would lead to the best economic outcome. Likewise, very rapid delivery of the campus could reduce the potential for investment in the local housing and tourism market, such that there is a balance to be struck.

1.2.36 Ms McMullen added in response to comments on the mode share targets in Table 3.1 of the **CWTP** [REP2-055] that the Applicant has not assessed workers using rail, but the Applicant will consider providing that as an aspiration and it is something that will be promoted and can be included in the next version of the **CWTP**.

1.2.37 In response to Mr Streeten's observations about the allocation of workers to park and rides and the sizing of the park and rides, Counsel for SZC Co. drew the ExA's attention to the Applicant's responses to ExQ1s where the Applicant had explained that car parks cannot be designed to 100% capacity because it is not practical to have people driving around looking for the one remaining space when they are trying to get to work. Ms McMullen further explained, although having regard to Mr Humphrey's

comment that he did not want discussion of the detailed design of the car parks and that could be dealt with in writing, that allocation to park and rides was based on the gravity model, and the quickest overall journey time to site has been used. That has not been challenged by the authorities. In practice, whether steps were taken to balance out the car parks and the allocation is something for the TRG to look at and agree. The differences between the two approaches are small in reality, such that it appears that the Interested Party is overanalysing matters and the issue is not a significant one. The ExA further asked that the Applicant set out in writing how the car parks are designed and sized, and how the allocation works by reference to journey times, workers and the areas from which they are coming, to which the Applicant agreed.

- 1.2.38 In response to a question about nighttime working, shift patterns and how they would arrive at site, Ms McMullen referred to the shift patterns set out in the **Code of Construction Practice** Part B (Doc Ref. 8.11(C)) but said that the question would be taken away to ensure that an accurate response was provided in writing.

Traffic Incident Management Plan

- 1.2.39 Counsel for SZC Co. confirmed in response to a question from Woodbridge Town Council that the Traffic Incident Management Area (TIMA) would be located at the southern park and ride facility but would be a separate area from the park and ride car parking, as set out in the **Traffic Incident Management Plan** (TIMP) [REP2-053] at paragraph 4.3.
- 1.2.40 Ms McMullen explained that notwithstanding the limited capacity for holding HGVs at the Plaza, the TIMA and the Freight Management Facility (FMF) provided capacity to hold back HGVs and buses off the network. The DMS system would be used to communicate with suppliers to hold back movements if necessary. Consideration would also be given to Mr Merry's point (on behalf of SCC) that information could be cascaded to LGVs and workers.
- 1.2.41 In response to the police raising the importance of scenario planning, Ms McMullen agreed and stated that this, i.e. what would happen in particular events, would be a useful thing to progress with the authorities in the next version of the **TIMP** [REP2-053]. The police would be involved in this.
- 1.2.42 In response to comments from local residents, Ms McMullen noted that road safety improvements were being provided on the network including the B1078 mentioned by Interested Parties, secured in the **DoO** (Doc Ref. 8.17(E)). In terms of workers, the target is that 80% are on sustainable modes, so it is only the 20% that are by car, and they would be limited to

the local area and would be local trips only, because of the restrictions imposed by the Applicant in getting a parking permit. In the event of an incident, concerns from Interested Parties as to the workforce re-routing off the A12 would only apply to this 20% and those workers would live within the boundary of the A12 in any event. McMullen confirmed that the scenario of an incident on the northern part of the network, i.e. away from the TIMA, would be considered in the scenario planning. Ms McMullen also explained that while the traffic modelling does not model traffic incidents, the **TIMP** [REP2-053] does plan for traffic incidents and how to manage them. The Applicant's **TIMP** is concerned with the Sizewell C traffic and cannot be expected to deal with re-routing by non-Sizewell C vehicles, but such traffic is managed on a daily basis by incident managers at SCC and the police.

- 1.2.43 In response to a question from Mr Wilkinson about emergency planning for the workforce, Counsel for SZC Co. noted that the Safety and Operations Director would be in attendance on the following Tuesday of the hearings who could address that question, or alternatively an answer could be put in writing.
- 1.2.44 In response to a question from Mr Stansfield, Ms McMullen confirmed that in the event of an incident vehicles would be held at the TIMA and so an emergency would not lead to the buses going through Wickham Market. Mr Stansfield's concern about workers driving through Wickham Market in an incident would be taken away to be part of scenario planning.
- 1.2.45 Ms McMullen stated that there was no proposal to stack HGVs on the SLR in the event of an incident.

Operational Travel Plan

- 1.2.46 Counsel for SZC Co. explained that the **DoO** (Doc Ref. 8.17(E)) obliged the Applicant to produce an Operational Travel Plan (OTT). Ms McMullen further explained that one had not yet been produced yet because it would be difficult to plan so far into the future. It would be more appropriate to have the relevant discussions with the authorities at the relevant time. The uncertain matters include what the public transport system would look like at that time and any move to electric vehicles. As to the obligation in the **DoO** to implement the OTT for five years after the end of construction, that is the period in SCC's guidance. However, in response to the ExA's and SCC's oral observations about the potential benefits of a Framework Travel Plan at this stage, the Applicant stated that it would take that away and consider it. [SZC Co. responded further to this in its **Written Submissions Responding to Actions Arising from ISH3** (Doc Ref. 9.50).]

1.3 Agenda Item 4: Consideration of local transport impacts

Difference in proposed mitigations identified in the Transport Assessment and those required by the Councils

- 1.3.1 Ms McMullen confirmed that there was a significant amount of alignment between the Applicant and SCC on the proposed mitigations. Ongoing work included mitigation for the B1122 and also the B1125. The main area of disagreement concerned the A12 corridor and the contribution sought by SCC. The Applicant has been reviewing the economic assessment by Aecom submitted by the Councils and will respond by Deadline 5 with a technical note. In short, however, the Applicant's modelling shows that on the 14km corridor there are increases in journey times of less than a minute. Although SCC has referred to figures of 24 to 43 hours, that relates to small numbers of seconds for vehicles added up over the day, and when the increase is looked at as a percentage it is actually only 1 - 2%. Indeed SCC in the Major Road Network consultation used the metric of seconds per vehicle, as used by the Applicant, so SCC clearly consider it a good indicator. Further, it is important to recognise where snapshots in time are being used, and the peak will not persist for the whole construction period at all but rather there will be a big bell curve. In response to Mr Humphrey's request that the ExA would hope that common ground might be found between SCC and the Applicant on this mitigation and dialogue might continue, the Applicant said that they would respond.

Approach to assessment of impacts in Chapter 10 of the Environmental Statement

- 1.3.2 In response to a question from Mr Humphrey, Ms McMullen explained that in Table 10.2 of Chapter 10 in respect of fear and intimidation, although the IEMA guidelines use extreme, great and moderate, and the Applicant has used high, medium and low, the Applicant was not downgrading but simply standardising them. However, the Applicant said that it would take the matter away to consider further whether it makes any difference. The Applicant confirmed that close work had been taking place with SCC to arrive at what the Applicant understood to be a largely agreed approach to the ES assessment, which took account of all of SCC's comments, and that a technical note would be provided to detail this.
- 1.3.3 In response to a further question from Mr Humphrey about the Applicant's response to TT.1.117 and why only a change in speed of 20mph would be considered a high magnitude of impact and whether that had been assessed correctly with reference to the guidance, Ms McMullen stated that the guidance was concerned with the change in speed and the magnitude rather than the actual speed of vehicles on the road. Further, the Applicant

could clarify in the updated assessment that this is an area where additional advice has been sought and discussions have been had with SCC.

- 1.3.4 In response to a question from Mr Humphrey about the Applicant's response to ExQ1 TT.1.122 [REP2-100] concerning the impact on B1125 at Westleton, and the applicability of DMRB LA112 given that the document concerns motorways and all-purpose trunk roads, which the B1125 is not, Ms McMullen explained that only considering percentage change can be misleading as you might potentially have one vehicle on a road and one extra vehicle would be a 100% increase in traffic and therefore consideration also needs to be given the absolute volume of traffic. But in any event things have moved on because mitigation is proposed on the B1125 corridor which should be in the next version of the **DoO** (Doc Ref. 8.17(E)) as a commitment and provision for contingency funding.
- 1.3.5 In response a query from Mr Humphrey about whether the Applicant's discussion of impacts and mitigation with SCC embraced the cumulative impacts with the Scottish Power application, with regard to ExQ1 TT.1.132, Ms McMullen confirmed that the discussions did recognise what Scottish Power were proposing and are seeking to tie the Applicant's mitigation in with that as well.
- 1.3.6 Mr Bull responded to a question from Mr Collins concerning mitigation on the B1122 and explained that discussions had already been had with SCC to discuss early years mitigation on the B1122, and it is proposed to be much broader than what is proposed in the Scottish Power application. Matters being considered include an appropriate crossing point, entry points to the village and enhanced pedestrian amenity. That will be taken forward with the Parish Council as well.
- 1.3.7 Mr Bull also responded to comments from Mr Cusack regarding severance and explained that for users of Littlemoor Road to cross the Middleton Moor link road and also the SLR, this had been subject to a road safety audit and this PRoW diversion provides a safer and 'quieter' location to cross. That was a direct response and change arising from the road safety audit. A pedestrian bridge in this location was not proposed as such an intervention would be based on the overall amount of traffic on a particular route. In respect of cycling, that was something being taken forward by the Applicant and as explained in **ISH2 Written Summaries** (Doc Ref. 9.42) it is felt that there is a huge opportunity. As to a bridge being provided there for pedestrians and cyclists, this was not being proposed.
- 1.3.8 In response to comments from Mrs Lavender, Mr Bull confirmed that the **DoO** (Doc Ref. 8.17(E)) did include a number of measures, including a controlled or more formal crossing in both Marlesford and Little Glemham.

NOT PROTECTIVELY MARKED

Proposals have been shared with the Parish Councils and another meeting with them has been arranged.

- 1.3.9 In response to a question from Mr Sutherell and a request for consideration of a crossing in Yoxford, Mr Bull stated that he would be very happy to sit down with Mr Sutherell and the Parish Council to discuss all elements of the project.
- 1.3.10 Mr Bull confirmed in response to a question from Ms Bassinette that mitigation for the B1125 was being looked at for inclusion in the Deed of Obligation, including additional pedestrian enhancement, village gateways and making the road safer for cycling.
- 1.3.11 In response to a question from Mr Galloway, Mr Bull explained that discussions had taken place over the years for what the right solution was at Fordley Road and the Applicant had sought to work with all stakeholders to come up with the right solution. It was not felt that an outcome like that proposed for Pretty Road in the change request was deliverable in this location. It is not possible to lower the level of Fordley Road due to the requirements of the Flood Risk Assessment. If the SLR was to be routed over Fordley Road by bridge it would increase the height of the road significantly which would create a very large structure in the landscape. As to severance between Middleton Moor and Kelsale, the Applicant was seeking to retain connectivity, and although it required a diversion onto the SLR it was felt to be the best outcome that could be achieved. There is no intention to promote any Sizewell C traffic on that road and signage will reinforce that. As part of ongoing discussion with the local authorities, the Applicant considers that there are ways of making these routes more visibly quiet, via signage and because the appearance is different to what would be normal route for traffic. In response to a request from Mr Humphrey to respond in writing to this issue and outline to the ExA the approach and options considered for this road, in a similar way to Pretty Road, Mr Bull stated that the Applicant would do so.
- 1.3.12 In response to a question from Mr Fortmann regarding the account which had been taken of impact on journey times of the mitigation proposed, Ms McMullen noted that a balance had to be struck between mitigation, which could respond to the needs of vulnerable road users in terms of crossing for example, and the impact on journey times. The VISSIM model deals with the network further south and the strategic model which covers the area further north may be unlikely to pick up such fine differences in journey times, for example due to speed limit changes.
- 1.3.13 Mr Bull responded to a comment from Mr Beach regarding the B1069 by saying that he would be very happy to have further discussions with Mr

Beach regarding SZC traffic on the B1069 but any intervention would be dependent on the outputs of the traffic modelling and environmental impact assessment undertaken.

- 1.3.14 In respect of points raised by Mr Collins, Mr Bull explained that the Applicant had worked hard with SCC public rights of way team to come up with the most appropriate safe diversion route. The landscaping strategy could present opportunities to respond to concerns as well. Regarding Mr Collins' suggestion for cycle lanes on the SLR, it is the B1122 which could be repurposed as a road more suitable for cycling after construction of the SLR. As to Mr Collins' comparison with HPC, Mr Bull drew attention to the fact that the Applicant is providing an off road cycle route from Sizewell Gap to the construction site and along Abbey Road and Eastbridge Road, which could feed into the tourism and heritage coast offer. In response to a question from Mr Humphrey about whether there was anywhere where the cycling plan including for the B1122 was set out, Mr Bull explained that it was a work in progress with the authorities and the Applicant would seek to formalise it and set it out for the ExA.