ExQ2: 03 August 2021
Responses due by Deadline 7: 03 September 2021

ExQ2	Question to:	Question:
R.2	**Radiological considerations**	
R.2.0	The Applicant, ONR	**Nuclear Site Licence** (i) Please advise on the latest position in respect of the application for the nuclear site licence. (ii) Are you aware of any impediment that may exist that would prevent or delay the granting of the licence? (iii) What is the current timetable that you would anticipate for the conclusions upon the license application being reached?
	SZC Co. Response at Deadline 7	SZC Co. submitted the Nuclear Site Licence (NSL) application in June 2020 and is actively engaged in all regulatory workstreams. Workstreams are monitored routinely via joint Level 3 and Level 2 meetings with the Office for Nuclear Regulation (ONR). The purpose of these meetings is to discuss the route and progress towards achieving a NSL in 2022 aligned to a schedule agreed with the ONR. The ONR's programme of regulatory interventions has been defined and is being delivered to support the licensing process and to meet the anticipated licensing timeline. SZC Co. is confident that the plant design is sufficiently mature and the organisation will be demonstrably capable to achieve a NSL in 2022. The ONR has not identified any issues that would prevent SZC Co. from obtaining a NSL within this time frame and SZC Co. is not aware of any impediment that may exist that would prevent or delay the granting of the NSL.
R.2.1	The Applicant, Environment Agency	**Site Licences and Permits** (i) Please advise on the latest position in respect of the application for the site licences and permits being considered by the EA. (ii) Are you aware of any impediment that may exist that would prevent or delay the granting of the licence or permit? (iii) What is the current timetable that you would anticipate for the conclusions upon the license/ permit application being reached?

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 7	The following three Environmental Permits were submitted in May 2020, followed by the related initial consultation in July to October 2020 in relation to the Operational Phase of Sizewell C: • Radioactive Substances Activities • Combustion Activities • Water Discharge Activities Routine regulatory engagement is held between SZC Co. and the Environment Agency to support the ongoing application process. No issues have been identified to date which would prevent or delay the granting of the permits. SZC Co. is engaging proactively with the Environment Agency, in order to bring forward the date by which the Agency can reach a 'Minded to' decision on each application.
SA.2	**Section 106**	
SA.2.0	The Applicant, ESC, SCC, Natural England, MMO, Trinity House	• Attention is drawn to the Commentary on the DCO which includes commentary on the Deed of Obligation
	SZC Co. Response at Deadline 7	Noted. Please see SZC Co.'s **Response to ExA's Commentary on the draft DCO and other Documents** (Doc Ref. 9.72).
SE.2	**Socio-economic**	
	The Applicant, SCC, ESC, Network Rail	**Rail Services** In trying to understand the socio-economic and community effects which may result from the development. Can you assist the ExA in understanding the status of the Rail Prospectus referred to within the LIR [REP1-045]. This appears to indicate that in order to support economic growth in the region upgrading of the rail line to improve both passenger and freight capacity during the construction period for the development is sought. (i) What status in planning terms does this document have? (ii) Would operating the night time rail freight service as proposed prevent the delivery of rail improvements during this period?

ExQ2	Question to:	Question:
		(iii) Had the Council's or Network rail developed a mechanism to fund the rail improvements envisaged within the prospectus, by for example requiring developer contributions through the Community Infrastructure Levy or other mechanism? (iv) Did the socio economic assessment consider the implications of effects of the DCO scheme on the potential delivery of rail improvements during the proposed construction programme?
	SZC Co. Response at Deadline 7	i) The Suffolk Rail Prospectus 2015 has no status in planning policy terms. It sets out ambitions for a wide range of rail enhancements across the county but it acts effectively as an encouragement to Network Rail as it plans and bids for investment in the network. ii) There is no reason why this should be the case. The Sizewell C rail freight proposals utilise existing capacity consistent with the designated gauge and declared capability of the East Suffolk line. They also involve enhancements to level crossings and potential commitments to relay parts of the track which would bring short term and legacy benefits to the line. iii) This is for SCC and Network Rail to respond to. iv) No – as no effects on potential rail improvements are anticipated.
TT.2	**Traffic and Transport**	
TT.2.0	The Applicant	**Transport Review Group (TRG)** The TRG has a pivotal role in overseeing the transport control mechanisms (CTMP, CWTP and TIMP) for the Proposed Development. In response to ExQ1 TT1.1.23 the Hinkley Point C experience is referenced. Understanding that this structure may work well at Hinkley Point C, there are some outstanding concerns not addressed by the response [REP3-046]. (i) Constitution – In what looks like a balanced voting membership there is potential for any disputes to be passed up to the Delivery Steering Group (DSG) for resolution. Consequently, further delays over any dispute resolution are likely. Why create voting members and not provide a casting vote method of resolving disputes without onward reference to another group? (ii) During the construction period some issues of local traffic management concern are likely to require rapid remedial response. Explain how the TRG

ExQ2	Question to:	Question:	
			can approve additional interventions and mitigation where a rapid response is needed.
	SZC Co. Response at Deadline 7	(i)	In addition to the precedent of the successful similar structure of the TRG at Hinkley Point C, as set out by SZC Co. in ISH3 [REP5-108], the Applicant does not consider a casting vote appropriate because the powers of the TRG are wide, including imposing a potentially uncapped liability on the Applicant to spend significant sums of money or take any action to remedy issues or stay within the limits committed to. All normal highway functions would be carried out by SCC – for example in relation to the design and implementation of agreed works on the highway etc. but the TRG is a wider governance process which requires a collaborative approach to joint working. In particular, the TRG has power over the Contingent Effects Funds 1 and 2, which are capped. TRG can amend the CWTP and the CTMP and the TRG also has power to approve mitigation measures to address shortfalls or exceedances in the event that any of the targets or limits set out in the **Construction Traffic Management Plan (CTMP)** [REP2-054] or the **Construction Worker Travel Plan (CWTP)** [REP2-055] have not been achieved or have been exceeded, or are not reasonably likely to be achieved or are likely to be exceeded. Any member of the TRG may propose such mitigation measures, not just SZC Co. This power enables the TRG to impose a potentially uncapped liability on SZC Co. Amendments to Schedule 16 of the **draft Deed of Obligation** (Doc Ref. 8.17(F)) to be submitted at Deadline 7 have sought to make these powers of the TRG clearer. In light of these wide TRG powers, SZC Co. does not consider that any one TRG member should have a casting vote. Imposing a potentially uncapped liability on a developer, at the discretion of a third party such as SCC (who have sought a casting vote for themselves), is not fair or reasonable. It does not comply with national policy in NPS EN-1 paragraphs 4.1.7 – 4.1.8 that obligations should be fair and reasonable. Giving a casting vote to SCC could

ExQ2	Question to:	Question:
		be akin to writing a blank cheque for wide ranging mitigation or operational changes. The ability to escalate matters to the DSG will enable any area where agreement cannot be reached to be re-examined by more senior representatives of the parties. It is reasonable to consider that may well lead to resolution. Escalation of disputes is a widely used and reliable method for resolving disagreements. In the unlikely event that resolution still cannot be reached, then Schedule 17 of the **draft Deed of Obligation** enables matters to be referred to an expert appointed in accordance with clause 8 of the **draft Deed of Obligation**, for independent determination which is final and binding in accordance with that clause. Overall, SZC Co. consider that this governance structure and process to resolve disputes will both be effective and appropriately protects the interests of all parties. It will also be sufficiently swift and responsive, for the reasons set out in the response to point (ii) below. (ii) The latest version of the **draft Deed of Obligation**, submitted at Deadline 7 (Doc Ref. 8.17(F)), includes provision for any member of the TRG to call an emergency meeting where that member considers it necessary (i.e. outside the regular quarterly meetings of the TRG). This would enable approval of additional interventions and mitigation where a rapid response is needed and enable consideration and response to be given to any other urgent matters.
TT.2.1	Suffolk County Council	**Streetworks Permit Scheme** The Applicant provided a response [REP3-046] stating that "The permit schemes implemented by SCC are authorised pursuant to Part 3 of the Traffic Management Act 2004 (the "TMA 2004"). The TMA 2004 is not disapplied by the draft DCO [REP2-015] and therefore the Applicant is of the view that the permit schemes would still apply to the highway works comprised in the authorised development. However, should SCC be of the

ExQ2	Question to:	Question:
		view that specific drafting is required to provide for the application of the relevant permit schemes to the works authorised by the DCO then the Applicant would be willing to consider including such drafting in a future revision of the draft DCO." Do you still consider revised drafting is required and are you progressing this with the Applicant?
	SZC Co. Response at Deadline 7	No response required from SZC Co.
TT.2.2	Suffolk County Council	**Suffolk County Council - A12 improvements: A14 'Seven Hills' to A1152 Woods Lane** Please clarify the position with respect to the following: (i) Status of the A12 major route network project; (ii) Whether the modelling work for this project included the modelling of Sizewell C impacts /mitigations; (iii) Does this modelling identify improvements in network performance for all traffic including Sizewell C traffic; (iv) Review paper in Appendix A [REP5-115] and provide any comments; and (v) Are you seeking a local contribution to this scheme proportionate to the impact of Sizewell C traffic on network traffic levels and performance?
	SZC Co. Response at Deadline 7	No response required from SZC Co.
TT.2.3	The Applicant	**Suffolk County Council - A12 improvements: A14 'Seven Hills' to A1152 Woods Lane** Please clarify the position with respect to the following: (i) Does your modelling examine the effect of the proposed scheme if constructed? (ii) Do you consider that the scheme as currently proposed would provide a benefit along the A12 corridor for Sizewell C traffic?

ExQ2	Question to:	Question:	
	SZC Co. Response at Deadline 7	(i)	See responses by SZC Co. to ExQ1 TT.1.61 [REP2-100] submitted at Deadline 2. That response confirms that the A12 improvements proposed by SCC between the A14 and A1152 have not been included or relied upon within the VISSIM modelling. These improvements are not committed and currently have no secured funding, and cannot be relied upon as a basis for assessment of the effects of Sizewell C. The VISSIM modelling of the A12 between the A14 and A1152 nevertheless concluded that there would not be a material impact on driver delay and therefore no mitigation in the form of highway improvements is considered to be required by SZC Co. for the corridor.
		(ii)	SCC considers that the shortest possible timescale for their proposed A12 improvements would be for them to be completed by the end of 2025 and could therefore be operational by early 2026. However, this is subject to receiving Government funding and the planning and design process. Based on the SCC optimistic programme, there would be no benefits of the proposed improvements during the early years phase or the start of the peak construction phase of the Sizewell C project. Instead there would be disbenefits to all traffic on the corridor, including Sizewell C traffic, as a result of the forecast two years of construction of the proposed SCC A12 improvements. The A12 improvements proposed by SCC identify highway capacity improvements at eight junctions on the A12 between the A14 Seven Hills and the A1152 Woods Lane, which include a range of measures such as signalising existing junctions, realigning arms of junctions, creating larger roundabouts and providing additional circulating lanes at roundabouts. It is also proposed to provide a new section of dualled road at Woodbridge. The majority of the SCC proposed A12 improvements are 'on-line' (i.e. improvements to the existing A12 corridor rather than constructing new sections of road/junctions on land outside of the existing carriageway) and would therefore require traffic management for the two year construction

ExQ2	Question to:	Question:	
			period which would result in some journey time delays for Sizewell C traffic and other traffic using the corridor. As set out in Chapter 9 of the **Consolidated Transport Assessment** [REP4-005], SZC Co. considers that there would not be an unacceptable impact of Sizewell C traffic on this part of the A12 corridor and no requirement for increased capacity has been identified. Notwithstanding this, it is considered that once the proposed SCC A12 improvements were operational there could be some short-term benefits for Sizewell C construction traffic although the extent of any benefits is considered to be limited. For example, any journey time benefit for the SZC traffic travelling on this section of the A12 needs to be seen in the context of the overall journey of the SZC traffic. The overall benefit to SZC HGVs on this section of the A12 would be negligible in percentage terms given the distances they will be travelling to/from the main development site. In addition, the primary purpose of the proposed A12 improvements is to reduce congestion in the network peak periods. However, Sizewell C construction traffic will be spread over the course of the day and will not be limited to the network peak periods, which will further reduce any benefits to Sizewell C traffic. In order to provide an estimate of the duration of any short-term benefits, the Sizewell C HGV and workforce profiles have been reviewed against the SCC outline programme of the A12 improvements. It can be seen from the HGV profile included in the **Material Imports and Modal Split Paper Appendix A** [REP5-114] that the daily number of HGVs reduces considerably for the last three years of construction and would be negligible for the operational phase. Therefore, any benefit of the A12 improvements to Sizewell C HGVs would only be for the six years between the start of 2026, which is the earliest date when the improvements might be expected to be operational, and end of 2031. Any delay to the SCC optimistic

ExQ2	Question to:	Question:
		programme for delivery of the A12 improvements would further narrow this period of potential benefit. Likewise, it can be seen from the workforce profile included in **Volume 2, Appendix 9A** of the ES [APP-196] that the workforce is expected to peak in year 7 (2029) and reduce after that point, with there being an average of circa 1,700 workers (construction and operation) for the last three years of construction. The workforce vehicle trips would align with the workforce profile and therefore any benefit of the A12 improvements to Sizewell C workers during the construction phase travelling on this part of the network would be predominately limited to the period of time between 2026 and 2031. In summary, notwithstanding that SZC Co. does not consider that there would be an unacceptable impact related to Sizewell C on this section of the A12, the SCC proposed highway improvements may result in some short-term benefits to SZC traffic on this section of the A12 but, as set out above, these are considered to be limited. In addition, any limited short-term benefits would be reduced by disbenefits (i.e. journey time delays due to on-line roadworks) during the construction of the A12 improvements. It is worth highlighting that SZC Co. and SCC have agreed a contribution to SCC's scheme. Please refer to the **draft Deed of Obligation** for details.
TT.2.4	The Applicant	**Associated Development Sites – HGV Movements** SCC [REP3-084] in their comments on responses to ExQ1 TT.1.15 tabulate the differences between the HGV levels set out in paragraph 3.3.6 the CTMP [REP2-054] and the levels provided in response to ExQ1. Clarify which are the correct numbers.
	SZC Co. Response at Deadline 7	Both sets of figures are correct. It should however be clarified that the figures stated in the **CTMP** [REP2-054] are correct but they are peak HGV movements and not an average over the construction period. The **CTMP** [REP2-054] will be updated to clarify this.

ExQ2	Question to:	Question:
		The distribution of materials over the construction of a project is not even and therefore an assessment of average movement requirements over the total construction period cannot be undertaken. SCC's tabulated figures assume even distribution over 313 (Mon – Sat) or 261 (Mon – Fri) working days of the year. The early earthworks phase and latter surfacing phase of the highway schemes demand much greater HGV imports than outside of these periods.
TT.2.5	The Applicant, Network Rail	**Darsham Level Crossing – Safety Concerns** Following ExQ1, TT.1.102 both parties were reviewing the situation with regard to the safe operation of this crossing. Provide an update on the progress of these reviews and whether any intervention is required as the result of the Proposed Development.
	SZC Co. Response at Deadline 7	SZC Co. has agreed to provide a contribution for the upgrade of Darsham Level Crossing to a full barrier crossing. As this is an existing safety concern for Network Rail with future funding understood to be set aside for the work, SZC Co. has proposed to provide a contribution of 50% of the cost of the full upgrade. This is still under discussion between the parties. Darsham, of course, is not affected by Sizewell C trains and the issue at Darsham arises from the location of the station car park across the A12 from the station. The current half barrier can encourage or enable unsafe behaviour from rail passengers. The Northern Park and Ride will add to traffic levels on this stretch of the A12 but the issue is understood to arise when traffic is static and the level crossing is in operation. Cars destined for the park and ride coming from it or buses coming to and from it to Sizewell C main development site in those circumstances would add to any short-term queue on the highway and should not in themselves pose a safety risk. Network Rail is believed to measure these issues on the basis that any increase in traffic in these circumstances theoretically adds to the (existing) risk. SZC Co. has agreed a Framework Agreement with Network Rail which commits the parties to work together to address the issue and is willing to contribute towards Network Rail's planned improvement. SZC Co. does not regard this as a 'requirement' in the sense understood by planning policy.
TT.2.6	Suffolk County Council, Suffolk Constabulary	**Abnormal Indivisible Loads (AIL) Management [REP5-114]**

ExQ2	Question to:	Question:
		Provide comment on whether the position with respect to AIL set out by the applicant is acceptable on the following routes: (i) A14; (ii) A12, Lowestoft to Leiston; (iii) A12, Woodbridge to Leiston; and (iv) B1122.
	SZC Co. Response at Deadline 7	No response required from SZC Co.
TT.2.7	Suffolk County Council	**Peak Hour HGV Caps** In paragraph 1.6.16 [REP5-114] the peak hour HGV movement caps are set out. Provide any comment on the peak hours chosen and the levels set.
	SZC Co. Response at Deadline 7	No response required from SZC Co.
TT.2.8	The Applicant	**Early Years – Definition in DCO** In the summary of the oral submissions for ISH3 [REP5-108] the Early Years was said to be defined as the period up to the completion of both the SLR and the TVB. In the Actions from ISH2 [REP5-114] and the proposed alteration to Requirement 8 of the DCO [REP5-028], it is said that controls would be in place until after the completion of the Park and Ride sites. The Early Years is an important period in terms of analysing and identifying the transport impacts of the Proposed Development. Clarify how this period is defined and controlled within the draft DCO.
	SZC Co. Response at Deadline 7	The 'early years' is defined within the **Construction Traffic Management Plan** [REP2-054] and **Construction Worker Travel Plan** [REP2-055]. The definition and rationale for the early years was discussed at ISH3, which is summarised at paragraph 1.2.1 of the **Written Summaries of SZC Co.'s Oral Submissions at Issue Specific Hearings 3** [REP5-108]. With regards to HGVs, the early years is defined in the **Construction Traffic Management Plan** [REP2-054] (paragraph 4.4) as the '*period of time prior to the delivery and availability of the Sizewell Link Road (SLR) and the Two Village Bypass*

ExQ2	Question to:	Question:
		(TVBP). In that period, the control applies that there can be no more than 600 two-way HGV movements per day'. With regards to the construction workforce, the early years is defined in the **Construction Worker Travel Plan** [REP2-055] (paragraph 3.4) as the '*period prior to the delivery of the northern or southern park and ride facilities. In that period, the control is provided by the early years mode share targets'*. The distinction between the Early Years period and the later construction and operational phases ensures that vehicle movements are appropriately controlled, until such time that suitable infrastructure is available to mitigate the forecast transport impacts. The separate definition for Early Years for (a) freight and (b) construction workforce is to ensure that the project is not unnecessarily constrained beyond the point at which mitigating infrastructure relevant to either (a) freight or (b) the workforce is provided. This is why it is not appropriate to have a single approach to defining the Early Years. The Early Years definitions and controls are set out in in the **CTMP** [REP2-054] and **CWTP** [REP2-055], which will be annexed to the **Deed of Obligation** (Doc Ref. 8.17(F)) and will be secured by that deed. Schedule 16 (paragraph 2.2 of the draft **Deed of Obligation** (Doc Ref. 8.17(F)) requires SZC Co. to implement and act in accordance with these documents. That provides the necessary control.
TT.2.9	The Applicant	**Main Development Site - Parking Controls** Given the reliance on mode share targets to control workforce traffic and travel it is important that consideration is being given to limiting the parking available for construction workers on site. Clarify the following: (i) Within the DCO the provision of parking on the Main Development Site will be controlled to ensure mode share targets are not exceeded; (ii) Within the DCO how the use of the temporary park and ride site on the LEEIE is controlled, throughout the whole construction period; (iii) Does the DCO prevent the creation of additional parking areas on site during the construction period; and

ExQ2	Question to:	Question:	
		(iv)	Does the DCO prevent the use of any of the permanent parking areas being used during the construction period for construction workers?
	SZC Co. Response at Deadline 7	(i)	Schedule 2, Requirement 8 of the **draft DCO** submitted at Deadline 7 (Doc Ref. 8.17(F)) includes parking controls for the main development site that are two-fold: First, the draft Requirement requires SZC Co. to build and use the car parking in accordance with Table 4.1 of the **Construction Method Statement** [REP5-048], which provides a breakdown of the temporary car parking at the main development site as well as the parameter zone location and the construction phase that the temporary car parking relates to. Secondly, parts 2a) and 2b) of draft Requirement 8 provide a control of the maximum limit of car parking within Work No. 1A before the northern or southern park and ride facilities are operational to 650 car parking spaces and after the northern or southern park and ride facilities are operational to 1,000 car parking spaces. Both the main development site car park and Land East of Eastlands are included in Work No. 1A. The early years limit of 650 car parking spaces prior to the northern or southern park and ride facilities are available has been calculated from the combined maximum accumulation at the main development site and LEEIE park and ride site (see Table 34 in Appendix 7B to the Consolidated Transport Assessment [REP2-046]), based on an 80% occupancy level. The 1,000 car parking space limit once the northern or southern park and ride facility are available is based on the total number of car parking spaces proposed at the main development site during the construction phase. Therefore, the combination of the car park phasing in the **Construction Method Statement** [REP5-048] and the absolute limits on car parking ensure that the mode share targets are met.

ExQ2	Question to:	Question:
		(ii) Refer to the response to (i). Table 4.1 of the **Construction Method Statement** [REP5-048] shows that the LEEIE park and ride facility will only be available for Phase 1. (iii) Schedule 2, Requirement 8 of the **draft DCO** (Doc Ref. 3.1(G)) requires the car parking to be built and used in accordance with the Construction Method Statement. Table 4.1 of the **Construction Method Statement** [REP5-048] provides a breakdown of the temporary car parking at the main development site as well as the parameter zone location and the construction phase that the temporary car parking is limited to being used for. Therefore, this acts as a control to prevent the creation of additional parking beyond that required at any point in time and beyond that set out in the Construction Method Statement. (iv) The absolute limit on parking spaces during the construction phase once the northern or park and ride facilities are available has been set at 1,000 spaces, as set out in part 2b) of draft Requirement 8 in Schedule 2 of the **draft DCO** (Doc Ref. 3.1(G)). This ensures that the total number of car parking spaces in Work No. 1A is limited to 1,000 spaces but that operational parking may be used by construction workers in the latter part of the construction phase when the temporary car parking at the main development site is being decommissioned.
TT.2.10	The Applicant	**Sizewell Link Road - Vehicle Distance Travelled Comparison** In paragraph 1.9.18 [REP5-114] Table 6 on electronic page 498 of [REP2-108] is referred to. Please explain why in the Assessment Table in Appendix A of that document why Alignment W results in 11% more mileage than Alignment Z, which is said to give the least route mileage of all options, given Table 5 [REP5-114] of the latest submission clearly shows the contrary?

<table>
<tr><th>ExQ2</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td>SZC Co. Response at Deadline 7</td><td>The assessment table in Appendix A of Appendix 5A Sizewell link road: Principle and Route Selection Paper Appendix 12 in the Responses to the ExA's First Written Questions (ExQ1) [REP2-108] has been reviewed and it is considered that the vehicle km results for Route W and Z should have been transposed and that route Z would result in 11% more mileage that route W. This aligns with the assessment for HGVs and buses in Table 5 of [REP5-114], which concluded that there would be 8-10% additional mileage for buses and HGVs to use the Sizewell link road when compared with W North. The percentages are slightly different because the Peer Review within Appendix 5A Sizewell link road: Principle and Route Selection Paper [REP2-108] was based on the integrated freight strategy, which resulted in more HGVs than forecast by the preferred freight strategy that has been described in [REP5-114].

The results presented in the Peer Review appended to Appendix 5A Sizewell link road: Principle and Route Selection Paper [REP2-108] have been updated to correct this error as set out in the table below but the revisions would not change the conclusions of the Peer Review.

<table>
<tr><th></th><th>Reported extra mileage</th><th>Score</th><th>Reported total score</th><th>Corrected additional mileage</th><th>Corrected score</th><th>Change in score</th><th>Corrected total score</th></tr>
<tr><td>On line</td><td>15%</td><td>1</td><td>41</td><td>15%</td><td>2</td><td>+1</td><td>42</td></tr>
<tr><td>W</td><td>11%</td><td>3</td><td>51</td><td>0%</td><td>5</td><td>+2</td><td>53</td></tr>
<tr><td>X</td><td>5%</td><td>4</td><td>50</td><td>5%</td><td>4</td><td>0</td><td>50</td></tr>
<tr><td>Y</td><td>20%</td><td>2</td><td>54</td><td>20%</td><td>1</td><td>-1</td><td>53</td></tr>
<tr><td>Z</td><td>0%</td><td>5</td><td>62</td><td>11%</td><td>3</td><td>-2</td><td>60</td></tr>
</table>
</td></tr>
<tr><td>TT.2.11</td><td>The Applicant</td><td>Sizewell Link Road - Route W Route – Vehicle Routeing
Paragraph 1.9.18 [REP5-114] The first bullet point refers to additional HGV and bus traffic through Yoxford. Given the Early Years limit on the B1122 is proposed to be 600 HDV /day</td></tr>
</table>

ExQ2	Question to:	Question:
		two way, if both the HGV and buses from the north were to use the B1122 it would be a total of 329 HDV two way /day, why it would not be a reasonable scenario for either HGVs or buses (or both) from the north to use the B1122. Explain why this was not considered in the assessment of route choices given that it is considered acceptable during the early years?
	SZC Co. Response at Deadline 7	Sizewell C HGVs and buses need to utilise the existing highway network during the early years prior to the delivery of the proposed new roads (i.e. Sizewell link road and two village bypass). Once the Sizewell link road is constructed all Sizewell C buses and HGVs from the A12 south and north will be routed on a fixed route with no route choice via the A12 and Sizewell link road, and this has been agreed with SCC. Were an alternative alignment to be selected (e.g. Route W), Sizewell C buses and HGVs from both the A12 north and south would also be assigned to Route W on a fixed route even if there were a more direct route that could be taken via the existing highway network – it would be the purpose of any new road between the A12 and the main development site to accommodate 100% of Sizewell C HGVs and buses as well as other Sizewell C related traffic. The question assumes that an alternative alignment (such as Route W) is constructed, but 329 HDVs two way per day from the north continue to use the B1122, rather than the new route. That such a significant proportion of Sizewell C HDV traffic would continue to use the B1122, rather than the new road, for the entire construction period, significantly defeats the purpose of and the case for the new road. Further, whilst SZC Co. recognises the impact on the B1122 communities in the early years (and is seeking to mitigate it as far as reasonably possible), the acceptability of HDV traffic on the B1122 for the relatively short duration of the early years does not make significant numbers of HDVs (e.g. the 329 HDV two way per day referred to in the question) acceptable over the full 12 year construction period.
TT.2.12	The Applicant	**Sizewell Link Road - Vehicle Distance Travelled Comparison**

ExQ2	Question to:	Question:
		As stated in Table 6 on electronic page 498 of [REP2-108] minimising route mileage is an important sustainability factor. Table 4 [REP5-114] shows only 2 peak hours and Table 5 shows the vehicle kms savings per day. Provide a calculation of how both of these translate to the whole construction period so comparison can be made for the whole of construction for cars, LGV and HGV.
	SZC Co. Response at Deadline 7	The **Sizewell C car and LGV** peak hour Veh-KMs are provided for 8-9am and 5-6pm peak hours in Table 4 of [REP5-114], representing all trips across the study area (not just those using the SLR/Route W North). These can be converted to the whole peak construction period using the following process: 1) Factor the 8-9am and 5-6pm peak hour Veh-KMs to 24hr average weekday (i.e. AAWT) levels, using the ratio of SZC traffic demand in the 8-9am and 5-6pm peak hours to 24hrs, as provided in Table 7.2 and 7.3 in the **Consolidated Transport Assessment** [REP4-005]. 2) Factor the average weekday (AAWT) values to average daily (i.e. AADT) levels using the approximate ratios of workforce presence as follows: • 100% workforce present Monday-Thursday • 85% present on Friday • 50% present on Saturday • 30% present on Sunday • ~ 0.81 AADT/AAWT ratio. 3) Factor the average daily (AADT) values to the peak construction period (10 years, based on the construction workforce profile summarised in **Volume 2, Appendix 9A** of the ES [APP-196]) by multiplying by 365 days x 10 years. Note the two-year 'early years' construction period is excluded from this analysis since the SLR would not be in place. 4) Since the daily SZC trip generation is based on the peak construction workforce (7,900) the values must then be factored by the average workforce level across the 10-year peak construction period (~0.59, based on the workforce profile summarised in **Volume 2, Appendix 9A** of the ES [APP-196]).

ExQ2	Question to:	Question:
		The additional calculations are shown in red in the updated 'Table 4' below, extrapolating the peak hour Veh-KMs to the 10-year peak construction period for Sizewell C cars and LGVs.

Updated Table 4: Comparison of Total Vehicle KMs (Sizewell C cars and LGVs)

Hour	Car total veh km (SZC)	LGV total veh km (SZC)	Total veh km
Sizewell link road			
8-9am	6,172	2,593	8,765
5-6pm	18,438	1,783	20,221
Total (peak hours)	24,610	4,376	28,986
Total (24hr AAWT)	255,935	27,284	283,219
Total (24hr AADT)	206,576	22,022	228,599
Total peak construction (10 years) *	422,522,224	45,043,362	467,565,586
Route W North			
8-9am	6,098	2,555	8,653
5-6pm	18,204	1,729	19,934
Total (peak hours)	24,302	4,284	28,586
Total (24hr AAWT)	252,732	26,712	279,444

ExQ2	Question to:	Question:

Total (24hr AADT)	203,991	21,561	225,551
Total peak construction (10 years) *	417,233,722	44,099,239	461,332,961
W North / SLR ratio	98.7%	97.9%	98.6%
Difference	-5,288,501	-944,123	-6,232,624

** based on workforce profile*

For Sizewell C buses, the weekday (AAWT) totals are shown in Table 5 of [REP5-114], representing only the route section between the A12 and the main development site (i.e. buses from the north were both measured from the A12/B1122 to the main development site and buses from the south were both measured from the A12/Route W north junction to the main development site, regardless of Sizewell link road or Route W North). These can be similarly factored to average daily (AADT) levels based on the workforce profile (0.81), then factored to the 10-year peak construction period by multiplying by 365 days x 10 years. As with Sizewell C cars and LGVs, the bus frequencies would essentially be pro-rata'd to the workforce levels so these values should be factored by the average workforce level across the 10-year peak construction period (~0.59, based on the workforce profile summarised in **Volume 2, Appendix 9A** of the ES [APP-196]).

For Sizewell C HGVs, the weekday (AAWT) totals are shown in Table 5 of [REP5-114], which represent the same route section between the A12 and the main development site as for buses. The peak construction period Veh-KMs can be derived as follows:

1) Calculate the weighted average distance between the A12 and the main development site (shown in Table 2 of Appendix 10 to Appendix 5D in [REP2-108]), based on the split of HGVs from south (85%) and north (15%).
2) The HGV delivery profile is provided in **Appendix 6A** of the **TT.2.25 response to ExQ2** which indicates a total of 458,139 HGV deliveries to the main development

ExQ2	Question to:	Question:

site across the whole construction period. Considering the 10-year peak construction period (year 3 to year 12) for consistency, this yields 377,339 HGVs deliveries in the 10-year peak construction period.

3) Double the HGV deliveries to achieve 754,678 HGV movements to/from the main development site across the peak construction period.
4) Apply the weighted average distance (in step 1) to the total HGV movements for each route alignment.

The additional calculations are shown in red in the updated 'Table 5' below, extrapolating the peak hour Veh-KMs to the 10-year peak construction period for Sizewell C HGVs and buses.

Updated Table 5: Comparison of Total Vehicle KMs (Sizewell C HGVs and buses)

Hour	Number of buses / HGVs per day	SLR veh km between A12 and MDS	W North veh km between A12 and MDS	Difference
HGVs (typical day)				
South HGVs (85%)	425	5,436	3,557	-1,879
North HGVs (15%)	75	567	1,160	593
Total typical day	500	6,003	4,718	-1,285
HGVs (busiest day)				
South HGVs (85%)	595	7,610	4,980	-2,630
North HGVs (15%)	105	794	1,625	831
Total busiest day	700	8,404	6,605	-1,799

ExQ2	Question to:	Question:

Total peak construction (10 years) **	**754,678**	**9,060,512**	**7,120,613**	**-1,939,900**
Buses				
South buses	296	3,786	2,478	-1,308
North buses	224	1,694	3,466	1,772
Total (24hr AAWT)	520	5,480	5,943	464
Total (24hr AADT)	420	4,423	4,797	374
Total peak construction (10 years) *	858,466	9,046,458	9,811,681	765,223
HGVs and buses combined				
HGVs (typical) + buses	1,020	11,483	10,661	-822
HGVs (busiest) + buses	1,220	13,884	12,548	-1,336
HGVs + buses (10 year peak construction period) based on worforce and HGV profiles	1,613,144	18,106,970	16,932,293	-1,174,677
W North / SLR ratio (based on typical day HGVs)			93%	
W North / SLR ratio (based on busiest day HGVs)			90%	

** based on workforce profile, Yr3 to Yr12 of construction (i.e. peak)*

*** based on HGV profile, Yr3 to Yr12 of construction (i.e. peak)*

ExQ2	Question to:	Question:
		The updated Table 5 above presents the same picture to that reported in REP5-114, in that the Route W north would result in around 7% (i.e. 18,106,970 / 16,932,293 = 7%) fewer Veh-KMs for HGVs and buses than the Sizewell link road alignment, when purely considering the difference in routes between the A12 and the main development site. Across the whole HGV journey, which would vary based on the ultimate origin, the percentage difference in Veh-KMs between the two alignments would be far smaller. The updated Table 4, which considers the whole journey of Sizewell C cars and LGVs across the study area, shows that the difference in Veh-KMs between the two alternative route alignments is in the region of 1-2% (i.e. marginally more Veh-KMs with Sizewell link road than Route W North alignment). Were this revised calculation to be factored into the analysis of preferred routes, it would make no material difference, partly because the percentage difference is relatively small but more importantly for all of the reasons set out, for instance, in **Appendix 5D Sizewell Link Road: Principle and Route Selection Paper** to SZC Co.'s responses to ExQ1 [REP2-108] and elaborated for instance at the CA hearing on 17 August, summarised in the oral and written submissions following that hearing (Doc Ref. 9.74 and 9.76) and set out in response to **Question CA.2.10**. Route W exists only as a theoretical, historic line on a map; it has not been worked up or presented as an alternative; it is not deliverable and it is not preferable in environmental terms to the selected Route Z (i.e. the Sizewell link road alignment). It is not an alternative in any practical sense and it cannot now be promoted as such consistently with the policy position set out clearly in section 4 of NPS EN-1.
TT.2.13	The Applicant	**Sizewell Link Road - Journey Time Comparisons** Appendix 10 [REP2-108] also states that the modelling undertaken considered journey times and some limited information is provided in the Appendix. Can the outputs of the model be used to calculate relative journey time differences for Route W and the SLR, if so provide the daily and total construction period outputs for the modelled journey times.

<table>
<tr><th>ExQ2</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td>SZC Co. Response at Deadline 7</td><td>
The model was only used to compare the assignment of traffic with the Route W North alignment in the 8-9am and 5-6pm peak hours, so it is not possible to derive modelled journey times for other hours. Journey time comparisons are not usually extrapolated over a period (i.e. construction period) as one would not sum or average the journey times based on the different years.

Notwithstanding this, an approximate comparison of Veh-Hours for SZC HGVs and Buses, which would be on fixed routes, can be made by multiplying the average peak hour journey time by the number of vehicles across the 10-year peak construction period (see Table 5 in response Question TT.2.12), to compare the Veh-Hours undertaken on the route section between the A12 and the main development site.

Table 2a below provides an average journey time and distance of the two peak hours, and the percentage difference.

Table 2a – Peak construction journey time and distance comparison (average peak hour)
<table>
<tr><th rowspan="2">Route</th><th colspan="4">Average peak hour</th></tr>
<tr><th>SLR</th><th>W North</th><th>Difference (s)</th><th>Difference (%)</th></tr>
<tr><td colspan="5">Average Journey Time (mm:ss)</td></tr>
<tr><td>A12 / W North (S) to main development site</td><td>09:21</td><td>06:25</td><td>-2:56</td><td>-31%</td></tr>
</table>
</td></tr>
</table>

ExQ2	Question to:	Question:

A12 / B1122 (N) to main development site	06:10	11:37	05:27	**88%**
Distance (km)				
A12 / W North (S) to main development site	12.79	8.37	-4.42	**-35%**
A12 / B1122 (N) to main development site	7.56	15.47	7.91	**105%**

Table 2b provides a calculation of the 10-year peak construction Veh-Hours for SZC HGVs and buses, on the route section between the A12 and the main development site.

Table 2b – Peak construction period Veh-Hours (SZC HGV + Buses)

Route	Total peak construction period						
	Number of HGVs	**Number of buses**	**Total HGVs + buses**	**Veh-Hours (SLR)**	**Veh-Hours (W North)**	**Diff**	**Diff (%)**
A12 / W North (S) to main development site	641,476	488,665	1,130,141	176,140	120,784	**-55,356**	**-31%**
A12 / B1122 (N) to main development site	113,202	369,801	483,002	49,675	93,537	**43,862**	**88%**
Total	**754,678**	**858,466**	**1,613,144**	**225,815**	**214,321**	**-11,494**	**-5%**

ExQ2	Question to:	Question:
		These tables demonstrate that there would be around 5% fewer veh-hours for Sizewell C HGVs and buses using Route W North alignment, when purely considering the difference in routes between the A12 and the main development site. Across the whole HGV journey, which would vary based on the ultimate origin, the percentage difference in veh-hours between the two alignments would be much smaller.
TT.2.14	The Applicant	**Sizewell Link Road – Temporary Haul Road.** At ISH 2 there was mention of the route of the Sizewell Link Road being used as a temporary haul road to move cut and fill around the SLR site and the temporary construction areas stockpiles. If this is correct it could lead to additional HGV movements on the section of the B1122 between the end of the SLR and the site entrance. Explain further: (i) How the haul road route would be used and whether such HGV movements have been assessed; and (ii) Any implications for HGV numbers on the B1122.
	SZC Co. Response at Deadline 7	(i) Details of the proposed Sizewell link road construction are set out in the **Material Imports and Modal Split Paper Appendix A** [REP5-114], which includes the early use of the SLR alignment for the haulage of some material. The section of the B1122 from the eastern end of the Sizewell link road to the construction site access point will be used as the access route to the site during both the early years and after the commissioning of the Sizewell link road. This short section of the B1122 does not have any sensitive receptors and Middleton Moor and Theberton are north-west of this location. (ii) During the early years 600 two-way HGVs have been assessed using this section of the B1122 between the SLR and main development site. However, 700 two-way HGV movements have been assessed using this section during the peak construction and, prior to the preferred freight strategy, the integrated freight strategy assessed up to 1,000 two-way HGVs on this section of the B1122 at peak construction during the busiest day.

ExQ2	Question to:	Question:
		The use of the SLR as a temporary haul road during its construction would result in some additional HGV movements on the short section of B1122 between the Sizewell link road and main development site to those assessed in the early years but would be within the HGV movements assessed for this section of the B1122 for the peak construction. For example, once the SLR is available to be used as a temporary haul road during its construction, there would be circa 20-30 two-way HGVs per day on this short section of the B1122 in addition to the 600 two-way HGVs per day assessed for the early years along the length of the B1122. For a short period (circa 5 months) there is expected to be 100-200 two-way HGV movements on this short section of the B1122 in addition to the 600 two-way HGV movements assessed in the early years along the length of the B1122. The use of the SLR as a haul road during its construction acts to diverts these HGVs off the B1122 through Middleton Moor and Theberton prior to the SLR's formal commissioning. Whilst there will be additional HGVs for this short less-sensitive section of the B1122 compared to the early years assessment, the HGV movements would not exceed those assessed for the peak construction for this section of the B1122.
TT.2.15	The Applicant	**Sizewell Link Road / B1122 – Traffic Corridor Analysis** In the written summary of oral submissions at paragraph 1.3.24 [REP5-107] it was stated that a response to the ExA question on this matter would be provided in the written submissions responding to actions at ISH2. Please signpost this response or provide the response.
	SZC Co. Response at Deadline 7	Table 8.5 of the **Consolidated Transport Assessment** [REP4-005] shows that in the early years (2023 Reference + SZC) the number of vehicles on the B1122 through Theberton is forecast to be 7,650 two-way vehicles per day. Table 8.9 shows that in the operational year (2034 Reference + SZC) the combined number of vehicles on the B1122 through Theberton and on the Theberton bypass part of the Sizewell link road is forecast to be 7,400 two-way vehicles per day. The ExA queries whether this demonstrates that

ExQ2	Question to:	Question:
		the impact of the early years on the B1122 is too great or puts doubt into the legacy benefit for the B1122. The retention of the Sizewell link road would reduce traffic flows on the B1122 in the operational phase to circa 400 two-way vehicles per day, which allows for the road to be repurposed through a package of walk and cycle measures, which are being progressed with SCC and ESC. Were the Sizewell link road not to be retained then the B1122 would carry over 7,000 two-way vehicles per day and the repurposing would not be possible. The further benefits of retaining the Sizewell link road are set out in SZC Co.'s response to Examination **Question CA.2.10**. Further, SZC Co. recognises the short-term impact on the B1122 communities in the early years and is seeking to mitigate it as far as reasonably possible through a combination of demand management measures and physical improvements.
TT.2.16	The Applicant, Suffolk County Council	**B1125 / B1122 – Junction Priorities** Create Consulting [REP5-258] on behalf of the Bacon Family express concern that the new arrangement with the link from the B1125 to the SLR alters the priorities where it meets the B1122. They suggest that the priority arrangements with the B1122 would make the B1125 a direct link and thus they consider it would serve to encourage the use of the B1125. It is understood discussions are ongoing with respect to the impact on the B1125. Could the issue of the junction priority for both legs of the B1122 from the new B1125 link be examined in this context?
	SZC Co. Response at Deadline 7	The highway connection from the B1125 to the Sizewell Link Road is required to minimise traffic flows on the B1122, in particular traffic flows through Theberton. Mitigating traffic impacts in Theberton is one of the principal objectives of the Sizewell link road.

ExQ2	Question to:	Question:
		Sensitivity testing using the strategic Sizewell C VISUM traffic model indicates that removal of the B1125 connection to the Sizewell link road would not result in any material reduction in traffic flow on the B1125 (and conversely providing the link does nothing to attract traffic to the B1125) but would result in a significant increase in traffic flows through the community of Theberton, and to a lesser extent increase flows on other sections of the B1122. Removing this link would therefore erode a noticeable element of the benefit of the Sizewell link road to residents in Theberton. The results of the sensitivity test are provided in the table below. It should be noted that this was a rapid sensitivity test to inform the examination so the precise numbers need to be treated with some caution, but the principles are clear.

Location	2028 Ref Case	2028 Peak Construction (busiest day)							
		Full SLR scheme		No B1125/SLR connection		Difference			
		SZC Traffic	Total Traffic	SZC Traffic	Total Traffic	SZC Traffic	% diff	Total Traffic	% diff
B1122 Abbey Road, Leiston (B)	4,950	3,353	8,278	3,353	8,286	0	0%	8	0%
B1119 Saxmundham Road, Leiston (C)	5,227	982	5,987	982	5,964	0	0%	-23	0%
B1069 Coldfair Green (D)	6,832	946	7,697	948	7,712	2	0%	15	0%
B1125 Westleton (F)	2,823	366	3,104	364	3,090	-2	-1%	-14	0%

<table>
<tr><th>ExQ2</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>B1122 Theberton (Q)</td><td>6,187</td><td>85</td><td>541</td><td>457</td><td>2,982</td><td>372</td><td>438%</td><td>2,441</td><td>451%</td></tr>
<tr><td>B1122 east of Yoxford (R)</td><td>4,288</td><td>682</td><td>4,558</td><td>682</td><td>4,572</td><td>0</td><td>0%</td><td>14</td><td>0%</td></tr>
<tr><td>Sizewell link road south of Theberton (AF)</td><td>0</td><td>2,278</td><td>8,552</td><td>1,896</td><td>6,145</td><td>-382</td><td>-17%</td><td>-2,406</td><td>-28%</td></tr>
<tr><td>Sizewell link road east of A12 (AG)</td><td>0</td><td>1,227</td><td>2,378</td><td>1,225</td><td>2,378</td><td>-2</td><td>0%</td><td>0</td><td>0%</td></tr>
<tr><td>B1122 Middleton Moor (AH)</td><td>4,288</td><td>4</td><td>372</td><td>10</td><td>799</td><td>6</td><td>147%</td><td>427</td><td>115%</td></tr>
<tr><td>A12 south of Sizewell link road (AI)</td><td>12,577</td><td>1,471</td><td>13,955</td><td>1,471</td><td>13,961</td><td>0</td><td>0%</td><td>6</td><td>0%</td></tr>
</table>

The western approach of the B1122 to the B1125 junction was re-aligned to form a right/left staggered junction in accordance with Design Manual for Roads and Bridges CD 123 Geometric design of at-grade priority and signal-controlled junctions. The staggered junction proposed is a safer junction form than a four arm priority controlled junction than would have resulted without the B1122 re-alignment.
See response to **ExQ2 HW.2.1** in relation to consideration of mitigation along the B1125.</td></tr>
<tr><td>TT.2.17</td><td>The Applicant, Suffolk County Council</td><td>**Yoxford Roundabout - Size of Roundabout**
The Heveningham Hall Estate (HHE)'s representation [REP5-278] maintains their view that a smaller diameter roundabout would serve the predicted traffic flows. Previous responses on this issue have focused on whether the proposed roundabout is acceptable. The point being made relates to whether a smaller roundabout with less land take could be operationally acceptable. Respond to this specific suggestion.</td></tr>
</table>

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 7	The Yoxford roundabout is designed as a 55m Inscribed Circle Diameter (ICD) roundabout to ensure the safe movement of Abnormal Indivisible Loads (AILs) between the northern arm of the A12 and the B1122. The size of the roundabout is principally driven by the need to accommodate the movement of AILs, as well as geometry of approach arms. The proposed design, shown on drawing no. SZC-SZ0204-XX-000-DRW-100019 [AS-132] shows an overrun through the central island for AILs to traverse, under police escort. During normal operation, vehicles would be prevented from using the overrun area by removable arrow and chevron signs, as well as physical separation between the overrun track and circulatory carriageway. The 40m ICD roundabout shown in Appendix 3 of the HHE note prepared by their traffic consultant TPA (Transport Planning Associates) [REP2-287] attached to the Heveningham Hall Estate (HHE) representations [REP5-278] is not designed to geometric standards set out in the Design Manual for Roads and Bridges (DMRB), in particular CD116 – Geometric design of roundabouts. It appears to be a screenshot from a traffic modelling software (VISSIM), which is not appropriate for geometric design of junctions. Furthermore, the AIL vehicle used by TPA to create the swept path shown in Appendix 4 of the TPA note [REP2-287] is smaller (2.55m wide and 27.6m long) than the largest AIL that the Yoxford roundabout has been designed for (up to 5.7m wide) for Sizewell C and Sizewell B, which does not have a beach landing facility. The AIL will therefore require a greater area within the road than shown in the TPA sketch. The TPA assessment of a 40m ICD roundabout is therefore not based on accurate information. SZC Co. commissioned Wynns, a specialist consulting engineer for AIL movements, to carry out an assessment of the AIL routes from the north and south to the Sizewell C main site, as described in the **CTMP** [REP2-054]. Tracking the correct AIL through a 40m ICD roundabout would result in the need to remove a substantial proportion of the central island and provide that area as an over-runnable carriageway. This design would result in an unsafe situation during normal operation. Car and HGV drivers approaching the roundabout would expect to be able to use the overrun area unimpeded, and consequently this could result in collisions with street furniture or side swipes. Drivers may perceive the circulatory carriageway width to include the overrun area, approach at higher speeds and try to take a straight line through the roundabout. The proposed roundabout of 55m ICD allows a large enough central island to create a dedicated AIL track through the island, which is separated from the circulatory

ExQ2	Question to:	Question:
		carriageway. This arrangement is much safer during normal operation. Police will be in control of the junction during escorting operations, when signs are removed from the AIL track. A material reduction in the ICD of the roundabout would result in a situation where the AIL track could not be kept separated from the circulatory carriageway; resulting in the safety concerns as presented above. However, highway designs submitted within the application are subject to technical approval of Suffolk County Council post DCO, and therefore design of the roundabout may be optimised through detailed design process. The **draft DCO** (Doc Ref. 3.1(G)), Schedule 2, Requirement 22 requires that highway works are carried out in accordance with the approved drawings, limits of deviation, and save to the extent that alternative plans or details are submitted to and approved by SCC. See SZC Co.'s response to ExQ1 CA.1.17 in relation to consideration of alternatives to compulsory land acquisition and provisions within the **draft DCO**, that could reduce the area of outright acquisition.
TT.2.18	The Applicant, Suffolk County Council	**Highway / Traffic Management / Public Realm Schemes – Implementation** Set out the expected implementation dates of the highway / traffic management / public realm schemes identified in the Deed of Obligation or the DCO that are not already shown in the Implementation Plan.
	SZC Co. Response at Deadline 7	The **Implementation Plan** [REP2-044] shows the indicative phasing, and duration of construction of the project, including the proposed environmental mitigation schemes included within the DCO order limits. Schedule 16 – Transport of the **draft Deed of Obligation** (Doc Ref. 8.17(F)) submitted at Deadline 7 has been updated to set out commitments for SZC Co. to provide funding to SCC for transport improvements as well as commitments for SZC Co. to deliver a number of additional off-site highway, traffic management and public realm schemes (e.g. Leiston Improvement Scheme, Wickham Market Improvement Scheme, B1078 Road Safety Improvements, Marlesford and Little Glemham Improvement Scheme etc). The timing of the delivery of the schemes to be delivered by SZC Co. set out in Schedule 16 of the **draft Deed of Obligation** (Doc Ref. 8.17(F)) has been discussed and agreed with SCC and is reflected in the **draft Deed of Obligation** (Doc Ref. 8.17(F)).

ExQ2: 03 August 2021
Responses due by Deadline 7: 03 September 2021

ExQ2	Question to:	Question:
TT.2.19	The Applicant, Network Rail	**Rail Delivery – Timescales.** In the Network Rail Update [AS-296] it is stated that "the Parties have signed a legal frameworks agreement and have agreed to work together with the aim of delivering 2 tpd by December 2022 and 4 tpd per day by August 2023 (i.e. to be operational)". Set out in paragraph 1.2.1 of the oral submissions from ISH2 [REP5-107] is that four trains per day is expected from March 2024. In addition, in the Material Imports and Modal Split paper, Appendix A [REP5-114] at the top of Page 7 it states that "It is necessary for the rail capacity to be provided by October 2023 (two trains per day) and March 2024 (four trains per day), otherwise the HGV limits would constrain the ability to bring material to the Main Development Site in sufficient quantities to support the construction programme." Please confirm the agreed implementation dates and comment on the deliverability of these dates: (i) Two trains / day; and (ii) Four trains / day
	SZC Co. Response at Deadline 7	The implementation dates are as set out in the **Written Summaries of Oral Submissions made at ISH2** [REP5-107] and the **Material Imports and Modal Split paper, Appendix A** [REP5-114] i.e. 2 trains per day from October 2023 and 4 trains per day from March 2024. The programme for completion of these schemes is robust and deliverable. Network Rail are aware of these planned implementation dates and are working with SZC Co. to support their delivery. The Second Statement of Common Ground between SZC Co. and Network Rail dated 23 July 2021 [REP5-095] provides a detailed combined programme at Appendix A, which includes the October 2023 and March 2024 dates (see final 'Trains Operating' section). The document confirms (para 2.3) that "*The work is currently on programme and neither party is aware of a reason why it should not be achieved on time*".
TT.2.20	The Applicant	**Material Imports and Modal Split Paper Appendix A [REP5-114] – HGV payload** The footnote at the bottom of Page 6 states "1 train = 1,250t payload. 1 bulk HGV = 27t payload. Therefore 1,250 / 27 = 46 deliveries or 92 movements ". Explain why this differs from the original payload assessment of 18.5t per HGV?

ExQ2: 03 August 2021
Responses due by Deadline 7: 03 September 2021

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 7	As noted in response to **TT.1.11 of ExQ1** submitted at Deadline 2 [REP2-100]: 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 footnote on p.6 of the Material Imports and Modal Split Paper (**Appendix A** of **Written Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1** [REP5-114]) specifically refers to 'bulk HGVs', i.e. those which will be used for bulk materials / aggregates. Given the use of trains for bulk materials / aggregates being referred to on p.6, this is the appropriate comparison. 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** [REP2-054]) up to low loaders and 28t tankers.
TT.2.21	The Applicant	**Material Imports and Modal Split Paper Appendix A [REP5-114] – Enabling Works.** Are these the works now proposed to take place in Year 0 of the Implementation Plan?
	SZC Co. Response at Deadline 7	The various references to 'Enabling Works' in the Material Imports and Modal Split Paper are in fact a reference to 'Phase 1: Site Establishment and Preparation for Earthworks', as set out in Plate 1.1 of the Implementation Plan [REP2-044]. As shown in Plate 1.1, these works commence in Year 1.
TT.2.22	The Applicant	**Material Imports and Modal Split paper Appendix A [REP5-114] – Enabling Works Backfill.** Section 4.2.1 suggests changes to export materials levels. Is this something that has changed or are these quantities already included in the assessments undertaken. If so, signpost where such materials movement has been assessed.
	SZC Co. Response at Deadline 7	The quantities referred to in **Section 4.2.1 of Appendix A** [REP5-114] are part of the overall material volume included in the assessment that has been undertaken. The purpose of the **Material Imports and Modal Split paper Appendix A** of **Written**

ExQ2	Question to:	Question:
		Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1 [REP5-114] is to provide additional detail and breakdown of the total material assessment to provide an understanding of the range of material demands and import requirements. To clarify this material is not additional and is included in the assessments already completed.
TT.2.23	The Applicant	**Material Imports and Modal Split Paper Appendix A [REP5-114] – Material Quantities.** The Table on page 22 shows the bulk materials and on 24 the non-bulk materials. Provide explanation why the total amount of freight shown at the bottom of the Table on page 24 is 13,247,555t, is greater than the stated 12.1Mt stated in Table 2.1.
	SZC Co. Response at Deadline 7	Table 2.1 of the **Freight Management Strategy** [AS-280] provides the anticipated quantity of *'construction materials'* required for the project, which includes backfill, concrete, steel etc. The temporary construction materials required to facilitate the construction (formwork, modular welfare units, consumables etc) are not included within these quantities. The tables on pages 22 (bulk) and 24 (non-bulk) of **Written Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1** [REP5-114] seek to demonstrate the *'total'* material and equipment imports and the means of transport to provide an understanding of the import requirements and modal split of these imports.
TT.2.24	The Applicant	**Material Imports and Modal Split Paper Appendix A [REP5-114] – HGV sizes** It is assumed that the analysis provided has made some assumptions off HGV sizes to move the required freight. What size of HGV has been assumed for: (i) Bulk materials; and (ii) Non bulk materials.
	SZC Co. Response at Deadline 7	The HGV sizes for bulk materials vary depending on the type and nature of materials. The typical assumed payloads per HGV by material type are indicated below:

ExQ2	Question to:	Question:
		Bulk Material: • Aggregates (concrete and backfill) - 27t • Ready Mixed Concrete - 14.4t • Powders (cement / GGBS) - 28t • Steel (reinforcement) - 24-28t • Pre-Cast Concrete elements - 20-28t Non-bulk Material: • Assorted ancillary materials (timber, formwork, propping etc) - 7.5-18t • Canteen supplies - 3.5-7.5t • Construction consumables (general store supplies e.g. small tools and equipment) - 3.5-18t • Waste export - 18t • Temporary welfare units - 18-28t
TT.2.25	The Applicant	**Material Imports and Modal Split Paper Appendix A [REP5-114] – HGV numbers** The profile charts provide graphical representation of HGV numbers but not in a way they can be easily equated to the weight of material transported as HGV is such a wide classification. Provide a tabulated assessment quarter by quarter of the numbers of HGVs, the weight of materials carried, and the percentage of HGV's over the 7.5t for each quarter. For the avoidance of doubt the ExA is seeking to establish a clear relationship between the HGV caps proposed and the required material quantities that would be delivered by road, considering the commitment of not more than 40% by road. As discussed at ISH2 using the average 18.5t capacity for HGV the caps as currently set out would in theory allow for most if not all freight required to be carried by road.
	SZC Co. Response at Deadline 7	As noted, if 18.5t were assumed as the average HGV payload the HGV caps and limit of road imports would provide sufficient capacity to import the required materials quantities by road. However, HGV sizes will vary depending on their source and the nature of the material.

ExQ2	Question to:	Question:
		Further assessment has been undertaken to estimate the typical type of HGV and average payload. During the Early Years (Years 1 & 2) this is predominantly OGV2 (18-44t GVW) HGVs with an average payload of 15.6t. These HGVs will be importing bulk material prior to the availability of the rail and marine infrastructure being established. During the Early Years period the proportion of smaller HGVs (3.5-7.5t GVW) ranges between 20 and 30% each quarter; these are not generally importing construction materials but ancillary items such as tools, fittings, consumables and service vehicles. During the peak construction period the typical HGVs are OGV1 (7.5-18t GVW) and LGVs (3.5-7.5t GVW) with an average payload of 9.0t. The rail and marine infrastructure provide sufficient capacity for the majority of bulk materials import, removing a large proportion of the larger OGV2 HGVs from the road. The requirement for the ancillary items continues and increases as the quantum of work expands. The average proportion of the smaller HGVs increases to 30 to 40% per quarter after year 2, with the continued requirement for ancillary items as well as smaller construction material deliveries of specialist items such as paints, construction chemicals and fittings. The table produced in response to ExQ1 TT.1.16 [REP2-100] submitted at Deadline 2 included peak daily HGV deliveries; this has been updated to include weekly and quarterly HGV deliveries as well as the forecast quarterly tonnage of imported material. Please refer to the Table in **Appendix 6A** for tabulated quantities per quarter as requested.
TT.2.26	The Applicant	**Assessment of Fear and Intimidation – Vehicle Speeds** In paragraph 1.10.7 [REP5 -115] it is stated that change in magnitude of average vehicular speed has been scoped out of the assessment. Signpost where this scoping exercise was undertaken in Chapter 10 [APP-198].
	SZC Co. Response at Deadline 7	**Chapter 10** (Transport) of the **Environmental Statement** [APP-198] (e.g. para. 10.6(e)(iv)) describes that traffic flows only (total flow and HDV) were used to inform the classification of Fear and Intimidation effects but does not explicitly state that change in average link speed has been formally scoped out. At the time of the scoping opinion it was not known if change in speeds would need to form part of the assessment of Fear and

ExQ2	Question to:	Question:
		Intimidation or not and it was therefore not formally scoped out at that stage. However, as part of ongoing consultation with SCC to reach agreement on the ES assessment, it has been agreed that change in vehicle speed should not form part of the assessment of fear and intimidation. The only locations where there would be an adverse effect on Fear and Intimidation due to change in traffic speeds over an 18-hour period, would be if there was an increase in the signposted speed limit on an assessed link. There are a number of locations where the speed limit is proposed to be reduced, as set out in **Schedule 14** of the **draft DCO** [REP6-006], but there are no roads where speed limits are proposed to be increased. The average speed criteria therefore has no influence on the Fear and intimidation assessment outcome.
TT.2.27	The Applicant	**Assessment of Fear and Intimidation – Vehicle Speeds** Table 10.2 [APP-198] sets out the assessment of magnitude of impacts for transport. The Fear and Intimidation Impact is based on the Table on Page 37 of the IMEA Guidance. The Table in the IMEA guidance has a footnote to say, "The traffic components can be weighed to give an overall score of fear and intimidation corresponding to particular combinations of traffic flow speed and composition." This suggests that it is the overall combination of these factors that needs to be taken into account and not each factor in isolation. It is stated in paragraph 1.10.4 [REP5-115] only if increases in speed occurred would speed be considered an important factor in the consideration of fear and intimidation. On the basis of what is stated in 1.10.4 explain: (i) The circumstances any development being considered could be predicted to increase vehicle speeds to the magnitudes set out in Table 10.2; and (ii) Where in the IMEA Guidance the change in vehicle speed is referenced as what should be taken into account rather than as it states the average speed of traffic. (iii) Where in the Guidance or Chapter 10 of the ES [APP-198] it is stated that the three assessments factors listed under the Fear and Intimidation are to be

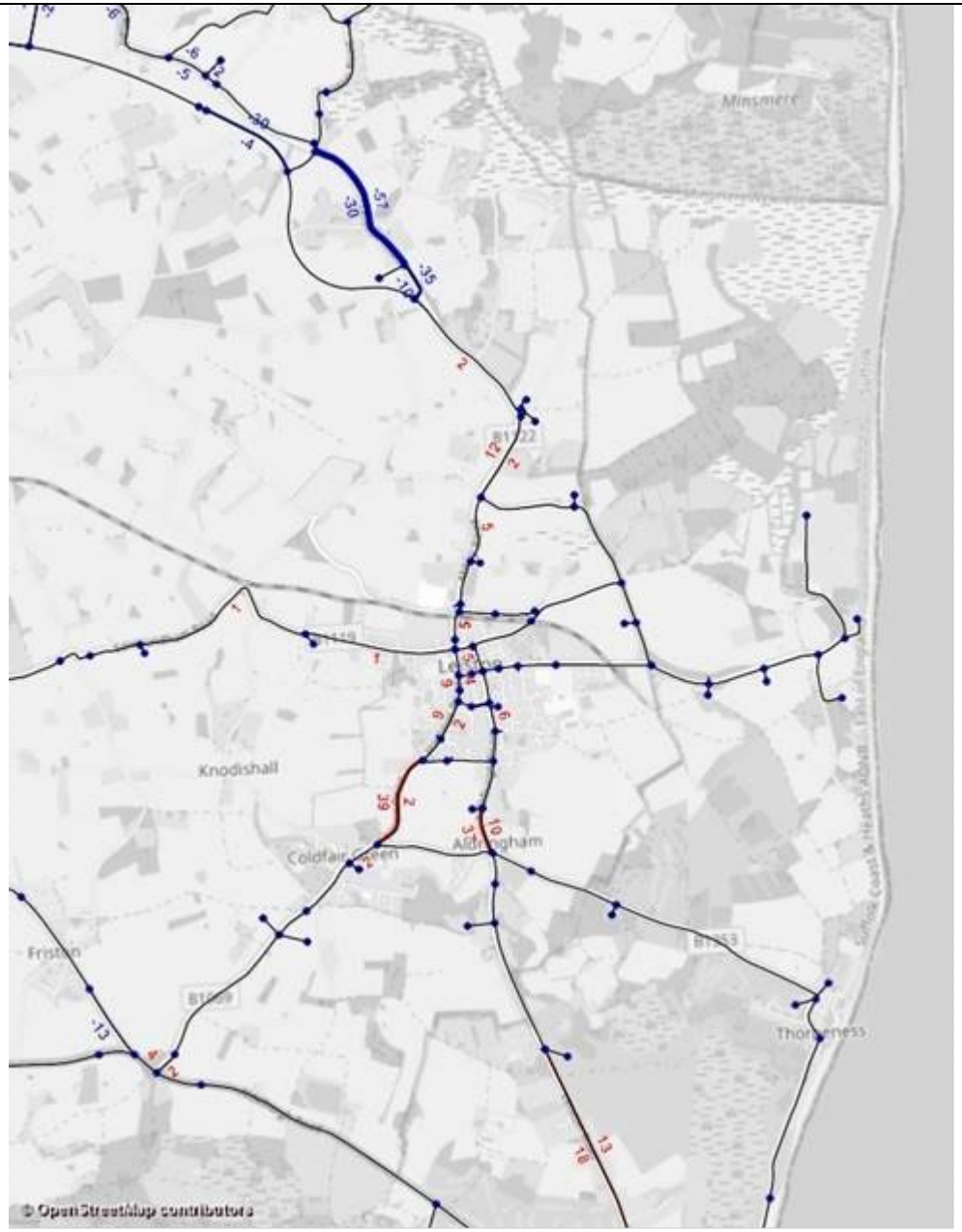
ExQ2	Question to:	Question:	
			considered individually and not in overall combination as suggested by the IMEA Guidelines
	SZC Co. Response at Deadline 7	(i)	The IEMA Guidance considers both traffic flow and speed in classifying the effect of a scheme on fear and intimidation. The thresholds for change in average speed from the fear and intimidation table in the guidance are: Extreme (20+mph), Great (15-20mph) and Moderate (10-15mph), and these average speed changes are measured across an 18 hour day. A change in traffic speed of this magnitude over an 18 hour day could be due to an increase in the signposted speed limit, or perhaps removal of speed control features (e.g. raised tables). There are speed limit reductions proposed in **Schedule 14** of the **draft DCO** [REP6-006] which could result in a beneficial outcome for fear and intimidation, but no proposed increase to speed limits that would increase the speed of vehicles travelling along a road across an 18 hour day.
		(ii)	An ES considers the sensitivity of receptors that could be affected by a development and the magnitude of impact or change likely to occur in order to classify the significance of effects. The magnitude of a potential impact refers to the extent of change. It is set out in the IEMA guidance that it is the magnitude of change that is being assessed, for example paragraph 4.1 states that *"having identified which environmental impacts are to be considered and the highway links which need to be included within the analysis, the next stage of the assessment is to quantify the magnitude of the environmental impact and to identify the level of significance that such a change may have."* Paragraph 4.5 goes on to state that *"A critical feature of an environmental assessment is determining whether a given impact is significant. Having quantified the magnitude of the impact (i.e. the level of change) there are various ways of interpreting whether or not this is considered significant."*

ExQ2	Question to:	Question:	
			With regards to the section of IEMA guidance on fear and intimidation, it does not explicitly state that the assessment should be based on change in speed but as set out above and throughout the IEMA guidance, the assessment should be based on "*magnitude of the impact (i.e. the level of change)*." If it were interpreted from the fear and intimidation guidance that it is the absolute traffic speed then it is not clear how the effect of a development on traffic speed in terms of fear and intimidation could be assessed as this would only assess the existing level of fear and intimidation experienced by vulnerable road users. Likewise, were the absolute speeds to be considered rather than change in speed, virtually every road in the UK would have an 'extreme' level of fear and intimidation as nearly all have a posted speed limit of 20mph. Ital is not considered that vehicles travelling at 20mph would result in an extreme level of fear and intimidation for existing vulnerable road users. It should also be noted that the proposed methodology for fear and intimidation based on change in level of traffic and speed has been agreed with SCC. Further, the fear and intimidation thresholds set out in the IEMA guidelines are also used by ENEVAL, a FORTRAN (FTN95) program, which performs a range of environmental assessments for CUBE and SATURN highway assignment models. The software assumes that the thresholds set out in the IEMA guidelines refer to the change in traffic flows / speed – _not the total traffic flows / speed in each assessed scenario. Accordingly, the approach adopted by SZC Co. to the IEMA guidance is that widely understood and applied, and it is considered that it provides a robust assessment. (iii) It is recognised that the guidance states on p.37 that *"The traffic components can be weighted to give an overall score of fear and intimidation corresponding to particular combinations of traffic flow speed and composition."* SZC Co. has sought to provide a worst case and robust assessment by assessing the individual components (i.e. change in total

ExQ2	Question to:	Question:
		traffic, HGVs and speed) and basing the significance of the effect on the component that has the worst significance without any weighting of the effects arising from the other components. Notwithstanding this, were we to weight the results, then speed would have to be weighted in such a way that it did not distort the assessment so as to make every 20+ mph road give rise to an extreme effect. Therefore, this approach is unlikely to lead to a significantly different outcome.
TT.2.28	The Applicant, Suffolk County Council	**Environmental Statement (ES) – Assessment of Impacts** Paragraph 1.10.8 [REP5-115] sets out that there are ongoing discussions with respect to the assessment of transport impacts set out in the ES. Set out the areas of disagreement and also what progress has been made in resolution.
	SZC Co. Response at Deadline 7	SZC Co. is to include an updated ES transport assessment within the Fourth ES Addendum to be submitted at Deadline 7 (Doc Ref. 6.18). This will address the comments raised by SCC on the ES as well as seek to address the comments raised by the ExA on the ES transport assessment.
TT.2.29	The Applicant	**Outage Car Parking – Transport Assessment** There was discussion at ISH5 about the permanent provision of two outage car parks, one each for Sizewell B and C. Following that discussion and taking into account comments made by Suffolk County Council [REP5-171], explain why it is considered that a double outage is considered so likely that it meets the criteria for exceptional circumstances in paragraph 5.9.10 in NPS EN-1, but it has not been assessed in the operational stage within the Transport Assessment. A double outage could have significant effect on operational traffic generation and the assessment of impacts undertaken. Should such a scenario not be considered by way of a sensitivity test of the assessments?
	SZC Co. Response at Deadline 7	The **Consolidated Transport Assessment** [REP4-005] seeks to assess a core scenario for the Sizewell C Project for different stages of the project. The assessment includes a reasonable level of robustness but, in accordance with WebTAG guidance, does not seek to create a 'universal worst-case scenario that takes into account all risks' (TAG Unit M1).

ExQ2	Question to:	Question:
		The **Consolidated Transport Assessment** [REP4-005] was scoped with Suffolk County Council as the local highway authority and an assessment of an unplanned outage with a planned outage was not required by SCC as part of the core assessment scenario. Notwithstanding this, there is a risk that a planned outage at Sizewell B could coincide with an unplanned outage at Sizewell C or vice versa and therefore separate outage car parks are proposed for each facility. Consideration has therefore been given in this response to the scale of traffic that that scenario would generate and whether it would result in new transport effects. A summary of this sensitivity assessment is provided below. A review of traffic flows across selected links close to the study area has been undertaken in the 2034 Operational phase to establish whether there would be any links with a substantially higher flow than has already been assessed in any hour, in either the 2034 Operational or the 2028 Peak Construction phase. Beyond this local study area the assessed 2028 Peak Construction traffic flows would be higher than traffic flows generated by a double outage. The 'Sizewell B outage' traffic flows on each link (which were already included in the Reference Case scenarios) have been manually added again to the total 2034 Operational phase traffic flows, to represent two outages occurring. A manual adjustment has been made to account for the fact that the Sizewell C outage car park would be accessed via the MDS roundabout on the B1122, rather than the Sizewell B access on Sizewell Gap. The assessment was undertaken for each link as follows: • The maximum flow in any of the seven modelled hours, in the 2034 Operational 'double-outage' scenario, was calculated. • This was compared against the maximum flow in any of the seven modelled hours in either the 2034 Operational or 2028 Peak Construction scenarios. • The difference between these two maximum flows on each link is presented graphically on the network diagram below (blue numbers are negative representing a decrease from what has already been assessed and red are positive representing

ExQ2	Question to:	Question:
		an increase from what has already been assessed). This demonstrates where traffic flows in the 2034 Operational phase, with a double-outage, could potentially be higher than any scenario already assessed within the DCO (red numbers within the diagram). • The diagram shows that there would be reductions in traffic on the B1122 and SLR compared to what has already been assessed. The diagram shows that around the local study area in Leiston the addition of an outage at Sizewell C as well as Sizewell B would not result in significantly higher traffic flows than has been assessed already as part of the DCO. The diagram shows the following increase in flows in the Leiston area compared to what has already been assessed: - B1122 north of MDS roundabout +2 two-way veh/hr - Abbey Road south of MDS roundabout +14 two-way veh/hr - Abbey Road south of Lover's Lane +5 two-way veh/hr - B1122 Aldeburgh Road +6 two-way veh/hr in Leiston, +13 two-way veh/hr at Aldringham and +31 two-way veh/hr between Aldringham and Aldeburgh - B1069 in Leiston +11 two-way veh/hr, +41 two-way veh/hr north of Coldfair Green, +2 two-way veh/hr south of Coldfair Green - A1094 at the junction with B1069 +2 to +4 two-way veh/hr The maximum increase in traffic generated by a double outage compared to the highest flows already assessed is +41 veh/hr north of Coldfair Green, which is less than 1 veh per minute increase.

		 Minsmere Knodishall Coldfair Green Aldringham Friston Thorpeness © OpenStreetMap contributors

ExQ2	Question to:	Question:
		It is therefore concluded that the scale of traffic generated by coincident outages would be less than the traffic which has already been assessed for the vast majority of the links. Where there would be increases in traffic these would be less than 1 two-way vehicle per minute and for a short-term period during the length of the double outage. It is therefore considered that no further mitigation is required beyond what is already proposed by SZC Co.