

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

The Examining Authority's written questions and requests for information (ExQ3)

Issued on 09 September 2021

Responses are due by Deadline 8: 24 September 2021

Suffolk County Council Registration ID Number: 20026012

Deadline 8

24 September 2021

1. Contents

G.3 General and Cross-topic Questions	2
AR.3 Amenity and recreation	2
Bio.3 Biodiversity and ecology, terrestrial and marine	3
CA.3 Compulsory acquisition	3
HW.3 Health and wellbeing	4
LI.3 Landscape impact, visual effects and design	6
NV.3 Noise and Vibration	7
TT.3 Traffic and Transport.....	12

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
G.3 General and Cross-topic Questions		
G.3.0	The Applicant, SCC, ESC	<p>Policy approach:</p> <p>Please confirm your view as to the correct policy approach in this case to development within the AONB in the light of relevant NPS, NPPF and Local Plan policies relating to major development in such locations?</p>
	SCC response at Deadline 8	<p>Our most detailed expression of the correct policy approach to development within the AONB can be found in the Local Impact Report (LIR) [REP1-045] under the ‘Policy context’ subheading of Section 6: Landscape and Visual Impact Assessment. In particular, the ExA’s attention is drawn to LIR paras 6.6-6.10 which deal with NPS content relating to the AONB, paras 6.12-6.14 dealing with local plan content relating to the AONB and paras 6.15-6.16 dealing with other relevant local policy relating to the AONB. SCC’s general position is that the different levels of policy do not conflict <i>per se</i>, rather they provide different levels of detail and specificity in relation to this development and are all matters to which the decision-maker must have regard for the purposes of s105(2) of the Planning Act 2008.</p>
AR.3 Amenity and recreation		
AR.3.0	The Applicant, SCC, Local Access Forum	<p>Suffolk Coastal Path</p> <p>It is expected that equestrians will have to dismount to ensure safe crossing underneath the permanent BLF, via the use of mounting blocks.</p> <p>(i) Do SCC regard this as a suitable solution for equestrians?</p> <p>(ii) How has the safety of elderly and disabled riders using such a facility been assessed?</p> <p>(iii) Are there details setting out the dimensions, type of block and suitability of surface both of the block and surrounding ground set out anywhere? If not how are these details to be agreed?</p> <p>(iv) What provision would there be for maintenance going forwards.</p>
	SCC response at Deadline 8	<p>(i) The latest ROW & Access Strategy states: “When the [permanent] BLF is out of season, the deck is removed, meaning that the clearance of 2.5m only applies during the BLF working season. It is expected that equestrians will have to dismount to ensure safe crossing underneath the permanent</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		<p>BLF, via the use of mounting blocks.” SCC considers this acceptable only on the condition the levels are incapable of being designed to allow mounted access under the BLF.</p> <p>(ii) This is a question for the Applicant.</p> <p>(iii) This is a question for the Applicant.</p> <p>(iv) Once the new route is completed to the satisfaction of the highway authority it will take on responsibility for maintenance. Where considered necessary the authority may require payment of commuted sums to offset the cost of any additional maintenance.</p>
Bio.3 Biodiversity and ecology, terrestrial and marine		
Bio.3.0	The Applicant, ESC, SCC, Suffolk Wildlife Trust	Protected species licensing, non-licensable method statements and the CoCP (Associated development, terrestrial ecology, section 6 page 178 and following) - Code of Construction Practice. Doc 8.11 revision 5 submitted at Deadline 7-. Are ESC, SCC and SWT content with the amended CoCP and various non-licensable method statements? If not, what do they require? Do Natural England have any views in relation to these.
	SCC response at Deadline 8	<p>Regarding the Code of Construction Practice, we note that at present this is an over-arching document that doesn't contain a huge amount of detail on Terrestrial Ecology. We note that approval for specific mitigations will rest with ESC or the Environmental Review Group and that there will need to be the <i>“necessary protected species licences issued by Natural England”</i>. With that in mind, we note that Species Specific Strategies are set out in various separate and supporting documents and those that are agreed (or otherwise) are set out in the Statement of Common Ground. We welcome the commitment to appointment of an Ecological Clerk of Works whose work will be supported by tool-box talks and briefings as well as the broad-brush approach to, e.g. on Invasive Non-Native Species.</p> <p>One area that doesn't appear to be referenced is Terrestrial Invertebrates, although these species are so habitat reliant that specific mention may not be required. It might be helpful for them to be added to the Table 6.1. If it is accepted that Terrestrial Invertebrates should be an additional Ecological Receptor Group, mitigation will need to refer to, e.g., the lighting, dust, noise and other related strategies as well as certain habitat management practices.</p>
CA.3 Compulsory acquisition		

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
CA.3.4	The Applicant, SCC	<p>Protective Provisions:</p> <p>The Applicant’s Deadline 7 Written Submissions Responding to Actions Arising from Compulsory Acquisition Hearing 1 Part 1, Section 1.13 considers Part 1 claims under the Land Compensation Act 1973 and at Section 1.15 considers the need for protective provisions for SCC. It concludes that there is no need for further protections. (i) Please indicate whether that this is now an agreed position, including in relation to any drafting changes to Article 21 (ii) Does SCC have any outstanding concerns in relation to the Land Compensation Act 1973 or Protective Provisions sought to safeguard its interests?</p>
	SCC response at Deadline 8	SCC accepts the alterations made by the applicant to article 21. Subject to this and satisfactory resolution of some minor issues relating to highway maintenance contained within the Deed of Obligation the authority SCC is prepared to withdraw its proposal for protective powers as the highway authority.
HW.3 Health and wellbeing		
HW.3.0	The Applicant, ESC, SCC, CCG	<p>Health Impact Assessment</p> <p>Should a Health Impact Assessment have been carried out to fully understand the implications of impacts on human health of the proposed development both during construction and subsequent operation?</p> <p>Can the Exa be assured that all potential health impacts have been properly understood, assessed and mitigated where appropriate</p>
	SCC response at Deadline 8	<p>The Applicant’s assessments of health impacts is covered in the ES Chapter 28 [APP-346] and its Appendices [APP-347]. SCC notes that our health is shaped by a range of factors and it is hard to be precise about how much each of these factors contributes to our health; this is particularly when considering the wide-ranging impacts of the construction of Sizewell C. While a Health Impact Assessment may have been helpful, SCC is not convinced that it would have provided substantial additional information.</p> <p>Based on the evidence provided in [App-346] and [APP-347], SCC has highlighted key areas they believe will be impacted by the development and subsequent operation and made sought mitigation measures based on these assumptions.</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		<p>SCC and the CCG, working closely together as an integrated system, recognise the interfaces and overlaps between the issues that may affect health and well-being. Our particular concerns are that the impact of the construction and the incoming workforce:</p> <ul style="list-style-type: none"> • Do not exacerbate existing inequalities in our areas of deprivation and among our vulnerable groups – for example Suffolk’s increasing ageing population with subsequent increasing vulnerabilities and complexities, young people and vulnerable adults at risk of exploitation • Do not put additional stress on our Suffolk workforce and services • Do not adversely impact on the ability of our communities to be a source of benefit to health and wellbeing <p>There is an imperative therefore to ensure that robust plans are in place to:</p> <ul style="list-style-type: none"> • Deliver proactive mitigation so that members of our population are not put at risk • Identify where timely, reactive mitigation is required through diligent monitoring of impact. <p>SCC accepts that the proposed on-site health service provision provided by the Applicant for the workforce will significantly reduce demand from the workforce on the wider health system, and will result in potentially improved healthcare for the workforce.</p> <p>SCC has reached in principle agreement with the Applicant on appropriate mitigations for public health, as well as for social care with its close interlinkages with health, but still need to work through some of the detailed wording within the Deed of Obligation. We understand that the CCG is also making generally good progress towards agreeing a package of mitigation for the health services within its remit, although we understand that disagreement remains with regard to a request for a contribution to dental services given the additional impact from the non-home based workforce anticipated by the CCG.</p> <p>We welcome that the Applicant has agreed to a request by the CCG in partnership with SCC to fund the provision of a post that will support monitoring the health impacts on the population throughout the development to ensure any adverse impacts can be proactively mitigated.</p>
HW.3.1	Applicant, NE, SPB/SWT, ESC, SCC, AONB Partnership, National Trust	<p>Displacement of Visitors</p> <p>Doc 9.94 submitted at D7 is a helpful summary of the different positions in respect of the potential for the displacement of visitors during the construction period.</p> <p>NE are continuing to recommend that SANG would be necessary and appropriate and this appears to be endorsed by RSPB/SWT.</p> <p>(i) In light of the continuing difference of view, please advise how you consider the effects on recreational amenity and whether the difference in figures which appears to</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		<p>remain, would lead to a different conclusion of effects on amenity and recreation issues.</p> <p>(ii) What do you consider would be necessary to overcome the possible adverse effects (if there are any) and how could this mitigation be secured?</p>
	<p>SCC response at Deadline 8</p>	<p>SCC defer to Natural England and East Suffolk Council on this matter.</p>
<p>HW.3.4</p>	<p>Applicant, CCG</p>	<p>First Written Questions - severance Please provide an update following the response to HW1.2 and the respective positions with regard to understanding severance and the effect on local communities.</p>
	<p>SCC response at Deadline 8</p>	<p>As severance is a matter that is assessed in the environmental assessment of transport and the methodology is consistent across the areas, it was considered that it might be helpful to provide a comment here. The assessment of the impacts of severance on transport has been agreed and applied by the Applicant; the Council are reviewing the updated ES Addendum [REP7-030], and have a small number of queries on impacts on links, as a result there remain a small number of links where there are potential residual impacts, including on severance, and confirmation of the method for mitigating these impacts is being sought.</p>
<p>LI.3 Landscape impact, visual effects and design</p>		
<p>LI.3.1</p>	<p>ESC, SCC, AONB Partnership, National Trust, Natural England</p>	<p>Design and Access Statement – Detailed Built Development Principles</p> <p>In response to FWQ LI.2.13 and LI.2.14 the Applicant has detailed amendments to Principles 56 and 57. Please review and provide a response to the appropriateness of the additional text.</p>
	<p>SCC response at Deadline 8</p>	<p>The text amendments to Principle 56 include the reference to the colour range that emerged from the study prepared for the AONB “Guidance on the selection and use of colour in development” that is referred to in par 6.17.3 of the DAS. As such, this gives more confidence on the use of colour for the turbine hall and is acceptable to SCC.</p> <p>The concern that SCC had on the design of the interim spent fuel store was that it was a substantial and prominent building that would endure in the landscape for longer than the rest of the power station. Thus it would have been appropriate that a bespoke design for this location could have been considered by the Examination. There is not now the opportunity for this to occur and in that context, the text for Principle 57 is an improvement on the original. There could also be the opportunity here to</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		refer to the AONB study (noted above) as the basis for the colour palette of this building to ensure a clear reflection of its location.
LI.3.2	ESC, SCC, AONB Partnership, National Trust, Natural England	<p>Estate Wide Management Plan for the EDF Energy Estate</p> <p>At Deadline 7 the Applicant submitted an Estate Wide Management Plan for the EDF Energy Estate (Doc 9.88). Please review and comment on the content and likely effectiveness of the plan. Are you content with the wording of Requirement 5C within the draft DCO (Doc 3.1 Revision 8.0)?</p>
	SCC response at Deadline 8	<p>In respect of landscape matters, the Council is content with the content of the plan and welcomes the embedded principle that the Estate Wide Management plan is designed to be adaptive to the impacts of climate change.</p> <p>We are continuing to review the EWMP in respect of ecological matters.</p>
LI.3.3	ESC, SCC, AONB Partnership, Natural England	<p>Associated Development Design Principles</p> <p>Please comment on the amendments made to the Associated Development Design Principles (Doc 8.3, Revision 3.0) submitted at Deadline 7, in respect of planting and hedgerows.</p>
	SCC response at Deadline 8	SCC is satisfied with the proposed amendments that have been made to the Associated Design principles in respect of planting and hedgerows.
NV.3 Noise and Vibration		
NV.3.6	Applicant, SCC, ESC	<p>Additional receptor at FMF</p> <p>D7 Appendix 11B response to LPA Second Request for Information has undertaken further noise assessment for the FMF set out under heading of Operation at para 2.3.</p> <p>There has been a suggestion there is a residential caravan adjacent the FMF in earlier representations [AS-321].</p> <p>(i) Has the assessment assessed the affects at this location?</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		(ii) Are the Councils able to confirm the status of this caravan and its precise location?
NV.3.15	Applicant, SCC, ESC	<p>Road Noise</p> <p>(i) Please provide an update on the assessment of quiet road surfacing, and in what areas this has been agreed (if at all), and to what standard.</p> <p>(ii) Please update how it is expected to be secured and maintained in the future assuming it is to be provided.</p> <p>(iii) It is understood that in order to maintain the noise saving properties a revised maintenance regime would be required. Please explain how this is to be delivered through the construction and operational periods, or if there is a different approach for each period.</p> <p>(iv) In the event there is a different approach please explain the justification for such an approach.</p>
	SCC response at Deadline 8	<p><i>(i) Please provide an update on the assessment of quiet road surfacing, and in what areas this has been agreed (if at all), and to what standard.</i></p> <p><u>Existing Roads</u></p> <p>SCC consider that lower noise surfacing would be an appropriate measure to reduce some elements of traffic noise to mitigation noise between LOAEL and SOAEL. The authority considers this would satisfy the aims in 5.11.9 of the Overarching National Policy Statement for Energy (EN-1). It is noted that replacement of the surfacing will also have a beneficial reduction in vibration arising from road traffic.</p> <ul style="list-style-type: none"> • Marlesford and Little Glemham Our understanding is that SZC Co have agreed to provide lower noise surfacing as part of the A12 Marlesford and Little Glemham Mitigation. SCC understands this will be secured by drawings appended as an annex to this agreement. This surfacing will need to be maintained for the whole SZC construction period.

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		<ul style="list-style-type: none">• Yoxford Our understanding is that no low noise surfacing has been proposed by SCC for this location. We note that if the pedestrian crossing proposed in the A12 Yoxford Mitigation within the Deed of Obligation is constructed it is likely that at least 50m either side of the crossing will require resurfacing to improve the skid resistance and, with careful selection of surfacing, would provide an opportunity to lower tyre noise at this location. Greater areas of resurfacing should be considered where LOAEL is exceeded.• B1122 Middleton Moor to Theberton Our understanding is that no low noise surfacing has been proposed by SZC Co for this location. SCC accepts the commitment to provide noise mitigation through the Noise Mitigation Scheme this does not mitigate noise for all receptors. The proposal to reduce speeds through Theberton to 20mph from commencement to opening of the SLR will help in this are but is not considered appropriate elsewhere. Where noise exceeds LOAEL on this road SCC considers low noise surfacing is appropriate. <p><u>New Roads</u></p> <ul style="list-style-type: none">• SLR and TVB In SCC's ISH8 (REP7-162) response we proposed that where noise mitigation was provided adjacent to locations where a major adverse impact occurred a SHW CI942 table 9/17 level 2 surfacing would be acceptable but if not level 3. <p>https://standardsforhighways.co.uk/ha/standards/mchw/vol1/pdfs/3796149%20MCHW%20Vol%201%20Series%20900_Print%20v0.2.pdf</p> <p>(ii) <i>Please update how it is expected to be secured and maintained in the future assuming it is to be provided.</i></p> <p><u>Securing lower noise surfacing (existing roads)</u></p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

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		<ul style="list-style-type: none">• Marlesford, Little Glemham: Secured through the A12 Marlesford and Little Glenham Mitigation Scheme in the Deed of Obligation, specifically plans appended to that agreement. <p><u>Securing lower noise surfacing (new road roads)</u> For TVB and SLR it is anticipated that this will be secured in principle through the Associate Development Design Principles and details approved through Requirement 22.</p> <p><u>Maintenance</u> After a maintenance period of 12 months the surfacing will become highway maintainable at public expense. Repairs and resurfacing would be undertaken commensurate with the SCC Highways Maintenance Operational Plan and Asset Management Policy and Strategy. Note that these policies do not specify like for like replacement of materials (see iii and iv)</p> <p>https://www.suffolk.gov.uk/assets/Roads-and-transport/how-we-manage-highway-maintenance/Highway-Maintenance-Operational-Plan-May-2021.pdf</p> <p>https://www.suffolk.gov.uk/roads-and-transport/highway-maintenance/highway-asset-management/</p> <p>(iii) <i>It is understood that in order to maintain the noise saving properties a revised maintenance regime would be required. Please explain how this is to be delivered through the construction and operational periods, or if there is a different approach for each period.</i></p> <p>Typically, thin surfacing last for approximately 10 to 15 years prior to replacement. This is less for materials such as lower noise materials with a higher void content (higher porosity) primarily due to oxidation of the bitumen and embrittlement leading to failures such as cracking, fretting or potholes. It is likely that the surfacing on the A12 at Marlesford, Little Glemham, TVB and SLR will require replacement during the SZC construction period.</p> <p>In terms of routine or cyclic maintenance no specific activities are undertaken although the noise suppression properties of the material would decrease if the surface texture reduces for example by compaction in the wheel tracks or mud or other debris filling the voids.</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

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		<p>Three options are available to replace the lower noise surfacing at these locations if necessary before the end of the SZC construction period, and hence impacts. These are, in order of SCC's preference:</p> <ol style="list-style-type: none"> 1. SZC Co enter into a s278 agreement with SCC to resurface the road themselves. 2. SZC Co pay SCC to resurface the road. 3. SZC provide a specific commuted sum to SCC to resurface the road. <p>During the operational phase SCC considers that it is not acceptable to bind the authority to an agreement to continue to replace the lower noise surfacing in perpetuity. Financially commuted sums are a partial remedy, but these are time limited and carry a risk that a shortfall would expose the authority to a commitment that is not sustainable over the longer term. Policies, guidance and availability of suitable materials may also change over time and prevent or restrict the authority in complying with such a commitment. For the SLR the authority notes that traffic volumes will significantly decrease once SZC is completed.</p> <p><i>(iv) In the event there is a different approach please explain the justification for such an approach.</i></p> <p>The highway authority has a duty under s41 of the Highways Act (1980) to maintain the highway maintainable at public expense. This is caveated by s58 of the same act that it is a defence to prove that the authority had taken such care as in all the circumstances was reasonably required to secure that the part of the highway to which the action relates was not dangerous for traffic, noting that noise is not considered a danger. To the best of our knowledge there is no requirement in this legislation nor in SCC's Asset Management Policy or Strategy to maintain roads with specific types of materials such as low noise surfacing.</p> <p>https://www.legislation.gov.uk/ukpga/1980/66/contents</p>
NV.3.16	Applicant, SCC, ESC	<p>Road Noise</p> <p>(i) Please provide an update on the provision of noise barriers along the SLR and TVB and whether these have now been agreed.</p> <p>(ii) Please provide an update as to how it is intended these measures would be secured</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

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		<p>assuming they are to be provided.</p>
NV.3.17	Applicant, SCC (ii and iii)	<p>Road Noise</p> <p>(i) Acoustical Control Engineers on behalf of Molletts Farm at D7 have expressed a preference for barriers along the side of the road, subject to them being appropriately designed to act as an acoustic barrier. Please advise on the progress on any adjustments that are being considered.</p> <p>(ii) Are SCC in agreement with the redesign of the barriers being reconsidered?</p> <p>(iii) Has a maintenance regime been agreed and secured?</p>
	SCC response at Deadline 8	<p>(ii) SCC has not been informed of the details of any proposals to instal noise mitigation on the TVB. The authority would welcome involvement in any discussions. The authority has a preference to bunding rather than acoustic fencing, primarily for lower future maintenance costs. It also has concerns that the location of acoustic fencing may have an impact on rights of way, particularly in terms of amenity.</p> <p>(iii) As no details have been received SCC cannot comment on the likely maintenance regime other than payment of commuted sums appears the most likely avenue to secure this. The authority raises similar concerns regarding a commitment to the permanent maintenance of acoustic fences considering the limited duration of commuted sum funding and uncertainty of future maintenance budgets.</p>
TT.3 Traffic and Transport		
TT.3.2	SCC	<p>SLR – Timing of Delivery and Impact on B1122.</p> <p>Are you satisfied that the Early Years mitigation along the B1122 and the controls</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		<p>proposed by the Applicant address any outstanding concerns relating to the B1122 prior to the SLR becoming operational? Set out any remaining areas of concern.</p>
TT.3.3	Applicant, Network Rail and SCC	<p>SCC response at Deadline 8</p> <p>Constructive discussions have been held with the applicant and Theberton Parish Council regarding potential mitigation measures. The proposal of a pedestrian crossing has been reviewed and while technically challenging may be possible although the requirement for street lighting associated with this is of concern to the Parish Council. An alternative of a 20mph limit through Theberton was proposed by Parish Council and following consideration by SCC would be accepted until the SLR is open. Other measures such as speed control in Theberton and mitigation to the west such as improvements to junctions and pedestrian crossing points have been subject to a detail technical discussion and it is anticipated that details will shortly be available for review.</p> <p>A12 – Darsham Level Crossing</p> <p>In response to TT.2.5 Network Rail (NR) have responded that they will be applying for funding for full barrier control crossing enhancement as part of its funding submission for CP7 (Mar 2024). They also note should funding not be secured, the mitigation works could not be delivered, and NR could not support the Park & Ride car park operation due to the unacceptable risk. The Applicant has already agreed a 50% contribution to the works, but delivery of the works will be dependent on NR securing funding for the other 50%. It is proposed to have a Framework Agreement concerning the additional contribution and NR state that the Northern Park and Ride can only become operational if mitigation is secured and delivered within 6 to 12 months of the opening of the Park and Ride site.</p> <p>Explain:</p> <p>(i) Is the enhancement to full barrier control considered necessary for safe operation of the level crossing to accommodate the additional traffic level associated with the Proposed development;</p> <p>(ii) What would happen if funding was not secured as part of the NR CP7 settlement;</p> <p>and</p> <p>(iii) Do the County Council have any views as to the safe operation of this crossing as a</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

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	<p>SCC response at Deadline 8</p>	<p>result of the Proposed Development?</p> <p>(iii) The County Council considers that the additional use by pedestrians accessing the park and ride together with the increase traffic resulting from construction of SZC would result in a detrimental impact on road safety. However, SCC does not have the expertise to calculate the theoretical impact using Network Rail's accepted methodology and cannot quantify this risk.</p> <p>SCC would welcome any improvements to the crossing on safety grounds and for improving pedestrian facilities. A small element of work within the public highway to improve the shared footway / cycleway is likely to be required together with modification of road signs and road markings. SCC is content that these matters can be addressed either through an arrangement with Network Rail so it is delivered as part of their scheme or separately as part of the s278 works for the Northern Park and Ride</p>
TT.3.4	Applicant, SCC	<p>Early Years - Farnham and Stratford St Andrew.</p> <p>Is there any mitigation proposed to manage the additional traffic through Farnham and Stratford St Andrew to mitigate any problems on the A12 through these villages in advance of completion of the Two Village Bypass? And additionally, explain the rationale for such an approach.</p>
	<p>SCC response at Deadline 8</p>	<p>Appendix 2C Part 2 of REP7-032 includes the results of the Applicant's updated Environmental Statement. The results show minor adverse impacts on links 22c, 23 and 24, which represent Farnham and Stratford St Andrew, albeit these include the use of professional judgement of the magnitude of impact by the Applicant. The impact of greatest concern on these links to SCC has been the increase in HDVs as a result of the Project and cumulative projects; which are in the order of (+837) 90% in the Project scenario and (+1,063) 115% in the cumulative (with SPR) scenario based on the Applicant's assessment. SCC considers these increases to be significant and whilst, using our own professional judgement, we may not agree that this was a minor adverse impact if it was occurring for the whole life of the project, the impacts at this location have been considered in the context of the length of time that they will be occurring, as well as the relative likelihood of the cumulative scenario occurring, and the likely actual profile of HGV movements on the corridor (including AD site HGVs). The impacts on these links are of a significantly shorter term, in the order of 30 to 36 months based on the delivery of the TVBP in the Implementation Plan [REP2-044], than will be experienced by similar nearby locations, and the subsequent long term beneficial impact with regards to the significant reduction in traffic that the</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		villages would experience has also been considered with regards to the potential need for short term mitigation. The Council have accepted the overall mitigation strategy at this location.
TT.3.7	SCC	<p>Control over Construction Traffic and Worker Travel</p> <p>Explain whether you agree with the controls proposed by the Applicant and if not explain why you consider some amendment is needed for:</p> <p>(i) HDV caps proposed within the Construction Worker Travel Plan; and</p> <p>(ii) Modal split control proposed within the Construction Worker Travel Plan.</p>
	SCC response at Deadline 8	<p>Excluding potential changes associated with the desalination plant, SCC agree with the proposed caps, subject to the proposed changes as set out at [REP7-062] 'Appendix H: Summary of Changes to be Made to the Transport Management Plans' which includes the following updates:</p> <ul style="list-style-type: none"> • Inclusion of monitoring of freight modal split. • Update of Early Years Cap to include HDVs. • Inclusion of a quarterly control with appropriate TRG review. • Inclusion of monitoring of north/south split of HDV traffic, including review mechanism. This may need to reflect potential implications of desalination plant e.g. monitoring and controls on movements on the A145. • Inclusion of additional peak hour monitoring and reporting. • Inclusion of further information on overnight timing restrictions. • Additional clarification on bus measures. • Additional clarification on parking limits. • Additional clarification on LGVs. <p>The Council have accepted the modal splits set out within the CWTP, both the targets based on the assessed figures and the aspirational target; however, as set out in Appendix 3B of [REP7-057]; the build out rate for the Accommodation Campus is set out to begin Q4 of Year 3 and not be completed until Q2 of Year 6. The peak construction mode shift targets require the delivery of the accommodation campus to achieve this modal split, and so it is not unreasonable to assume that the development will</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		<p>fail to achieve the main targets between delivery of the park and ride sites and completion of the accommodation campus, which might represent 4 years of the project's build out. SCC are of the opinion that this can be managed through the TRG, with the proposed update to the CWTP to include the ability for the TRG to set interim targets as indicated in [REP7-062]. However, the ability for the TRG to identify potential issues and respond is reliant on the availability and reporting of comprehensive data.</p> <p>As set out in our responses at Table 5 para 1.2. and Table 8 para 1.6.10 and 1.6.63 of REP6-049, SCC do not agree that the proposed car parking limits and modal split provide a sufficient control on worker vehicle movements; however, are of the opinion that sufficient monitoring, reporting and governance through the TRG would allow for proactive and reactive management of any issues as they arise. The monitoring of modal split alone is not considered adequate for worker travel, and the monitoring of vehicular levels at the key car parks is under discussion.</p> <p>SCC have not yet reached agreement with the Applicant however on the extent of monitoring and reporting, including regularity of reporting, but following recent discussions believe we are close to agreement, subject to agreeing the details of the required reporting, and await submission of the updated CTMP and CWTP, which SCC will need to confirm reflect those changes proposed.</p>
TT.3.8	The Applicant, SCC	<p>Highway Mitigations.</p> <p>Outline the mitigations proposed and also explain any areas where mitigations are yet to be agreed for the following locations:</p> <ul style="list-style-type: none"> (i) Marlesford; (ii) Little Glemham; (iii) Yoxford; (iv) Middleton Moor; (v) Theberton; and (vi) B1125 Westleton and Blythburgh

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
	<p>SCC response at Deadline 8</p>	<p>The list of mitigation schemes has been agreed in principle. However, a number still require the submission of details to provide comfort to the authority that the proposed mitigation scheme is acceptable. It is understood these details, where available will be appended to the Deed of Obligation.</p> <p>These are the following:</p> <p>(i) and (ii) Marlesford and Little Glemham Mitigation includes pedestrian crossings, footway improvements and, in Marlesford, a reduction in the speed limit,</p> <p>(iii) Yoxford Mitigation Scheme includes a pedestrian crossing located adjacent to the High Street Junction on the A12.</p> <p>(iv) and (v) see TT.3.2</p> <p>(vi) The applicant has discussed potential mitigation in Westleton with SCC but has yet to provide details for review and comment. No proposals have been put forward for Blythburgh.</p> <p>However, the Applicant and SCC are in regular correspondence and it is anticipated that agreement will be reached before the end of the examination.</p>
TT.3.11	SCC	<p>“Rat Running or Alternative Route Selection”</p> <p>Explain your views as to the effectiveness of the Applicant’s proposed strategy for monitoring and addressing any issues relating to “rat running”. In addition, provide details of any areas where the Council considers that additional controls would be beneficial and the reasoning for such additional controls.</p>
	<p>SCC response at Deadline 8</p>	<p>Breaches in routing for HGVs and buses are proposed to be identified using GPS and geofencing and this is considered acceptable especially as it is understood that this can be identified almost immediately.</p> <p>In terms of rat running by other vehicles, the assessment allows free route choice for other modes such as cars and LGVs and there would be little to limit their routing other than through a signage strategy. There have been concerns in relation to the bypassing of congestion on the network through towns and villages, especially those located alongside the A12. The network within those locations has been added to the model to try to replicate these routes and to identify the level of traffic using these routes and</p>

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		<p>therefore taken into consideration in the modelling. No issues were identified with low levels of traffic using alternative routes with the majority of traffic associated with the development and that already on the road network remaining on the main route. This has been reviewed as part of the auditing process of the strategic models and is considered to be acceptable.</p> <p>Rat running by its nature is difficult to model and even more difficult to assess in terms of impact as small volumes of additional vehicles will have a significant impact on local perceptions. The disturbance of the local highway network, particularly along the B1122 corridor with many changes in the location or roadworks and other disruption is likely to make any changes in traffic by its fluid nature difficult to interpret particularly in the early years. Much of this traffic is likely to be local uncontrolled traffic rather than SZC construction traffic which is subject to control.</p> <p>As set out in our response to TT.1.87 of our Response to the EXA's Written Questions [REP2-137], the natural route for some workers to travel from their home either to the Main Development Site, or the Park and Ride sites will not be via the A12, B1122 or Sizewell Link Road, and so vehicle movements by workers, whilst not reasonably considered as rat running, will increase along the vast majority of local roads. Vehicle movements will also increase as non-home bound workers undertake other non-work journeys.</p> <p>There are a number of measures that the Applicant has proposed to reduce the potential impacts of worker vehicle movements which means that either workers will not be travelling by car or that the length of their journey by car is reduced; these include:</p> <ul style="list-style-type: none">a) Provision of the accommodation campus and LEEIE caravan park (both by ensuring they do not need to drive to site and providing facilities meaning that in some cases they will not need to travel off-site)b) The Park and Rides (including the postal consolidation facility)c) The Lowestoft Bus serviced) The Ipswich Bus Servicee) The Woodbridge Bus service

ExQ3: 09 September 2021

Responses due by Deadline 8: 24 September 2021

ExQ3	Question to:	Question:
		<p>Further to the bus services modelled above, as part of the bus strategy, as the development builds out, locations that could support a bus service to reduce impacts on rural communities will be identified and investigated through the Transport Review Group. The current aim through the CWTP is for around 80% of the workforce to travel by either walk, cycle, direct bus or park and ride to/from the site. To ensure that staff travel to the site by the correct bus (i.e. their nearest bus), the proposals include a parking permit system, an electronic reader for bus passengers and allocation of model of travel.</p> <p>SCC consider that subject to the proposed changes to the management plans, that the measures in place are acceptable (excluding potential changes associated with the desalination plant); however, we are yet to fully agree the extent of monitoring and reporting but are hopeful this will be achieved.</p> <p>If rat-running is considered to be a key concern, the potential exists to use ANPR cameras on the routes to the site, or at those locations where 'rat-running' is of particular concern, and at the site accesses; it would not be difficult to discern on that basis the routeing that was occurring and to investigate ways to encourage use of the main road network by SZC workers; however enforcing any behaviour would be more difficult.</p> <p>Where reports of rat running are received during the construction of SZC this is reported to the TRG, and can be investigated. The importance of data being readily available with regards to total worker vehicle movements is considered key to the TRG's ability to make informed decisions quickly.</p> <p>Whilst a process could be put in place for LGVs (assuming exceedance of assessed numbers) worker car movements would not be restricted from routes that are open to the general public.</p> <p>Thus, in summary the Council accepts that where rat running occurs it is likely to require a reactive action instigated by the TRG using the contingent fund to fund any mitigation of significant adverse impacts.</p> <p>The Council are satisfied that the current proposals are reasonable, subject to relevant changes to the CTMP as set out in our response to TT.3.7 and believe that the TRG are able to investigate potential issues and solutions.</p>
TT.3.14	SCC	<p>Fly parking</p> <p>Provide any comments on whether the Council considers that the fly parking approach proposed by the Applicant is robust enough to address any problems that may arise.</p>

ExQ3: 09 September 2021**Responses due by Deadline 8: 24 September 2021**

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	SCC response at Deadline 8	<p>Additionally, provide any additional mechanisms you consider would improve the effectiveness of the proposed response along with the reasoning for such suggestions.</p> <p>As set out at to TT.1.36 of our Response to the EXA's Written Questions [REP2-137], SCC understands that the proposed process has been relatively successful at Hinkley Point C both in identifying fly parking and reducing fly parking, as well as showing that a number of cases of reported fly parking related to legitimate worker parking.</p> <p>Importantly, the proposed monitoring of bus services will help to minimise the potential for fly parking by ensuring that workers use the correct bus.</p> <p>The management of fly parking is a multistage process set out in section 4.7 of the CWTP that includes reasonable process for identification and enforcement. However, it is also recognised that the process may need to be amended through the TRG to reflect specific local circumstances or to be more effective as stated in the CWTP ([REP2-055] section 6.4.3).</p> <p>One area of concern for SCC would be the delivery of the accommodation campus; it is a key piece of infrastructure for minimising construction workforce vehicle impacts and the later delivery may mean a greater proportion of workers need to travel to site, if these workers were based within the 'drive to site' catchment area. The car park's capacity may mean that not all workers are able to drive to the site, and so appropriate bus services or other potential measures would need to be identified and as a result these potential issues need to be identified as quickly as reasonably possible.</p> <p>Monitoring will be key to allow for early reactive measures if fly parking does occur. SCC is of the opinion that the proposed process is reasonable but cannot say absolutely that it could deal with any issue that arises, for instance there is a finite amount of contingency funding, and the implementation of Traffic Regulation Orders, and potentially associated infrastructure, mean that whilst solutions may be identified they may not in all cases be deliverable, nor may they be wholly popular meaning that they face objection from other parties.</p>