

The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 8 – 25 March 2021

Comments of Suffolk County Council as Local Highways Authority

1. Post hearing submissions including written submissions of oral case (if required) (ISH10 to 15 & CAH13)

Response to ISH 13 'Traffic and Transport

Agenda Item 2. Regional freight strategy – AIL and HGV

a) Choice of port

In REP5-055 para 6.5 SCC responded: *“Whilst we note the Applicants’ commitment to assessing port traffic once the exact location of the port is known, as noted in our oral submission, we remain concerned that the omission of these impacts does not allow for all parties to understand the total, holistic, impacts of the development. This issue is further exacerbated when trying to understand in combination impacts with other developments (both for NSIPs and applications determined under the Town and Country Planning Act)”*.

SCC also expressed concern that the Port Construction Traffic Management Plan should not exclude any need to consider whether port traffic for the construction of the onshore works should be included within the remit of the Plan. Whilst SCC notes the Applicants’ expectation that aggregates in particular will be sourced from within the region, over the duration of the project(s), the potential for marine aggregates to be used (whether for commercial/pricing/continuity of supply or other reasons) cannot be precluded, and SCC would therefore wish to see the remit of PTCMP revised to allow the interaction between port traffic and the onshore works to be addressed as necessary.

b) Choice of mode – road, rail, short sea to beach landing facility

The LHA position is that the choice of transport mode, particularly for freight should accord with NPS 1 (5.13.10); *Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective.*

POSITION: As LHA we would support use of any transport modes that reduces HGV traffic on the local network, including if the SZC beach landing facility can be used by SPR.

c) Resulting AIL routes and movements, including through Leiston

A preferred heavy load route, HR100, is published by the DfT for loads from Lowestoft (south bank) to Sizewell B. There is no equivalent route from ports at Felixstowe or Ipswich to Sizewell nor one south of the B1122 Abbey Road / Lovers Lane. Therefore, Circular 61/72, which in itself is dated and of limited use in terms of protecting heavy load routes, is of relevance only to the Lowestoft to Sizewell B HR100.

In the Wynns report Appendix 26.3 (APP-529) the following historical movements of heavy loads are recorded:

- 2010, 166t load from Lowestoft to SZB (4.2)
- 2013, 166t load from Lowestoft to SZB (4.2)
- 2016, 170t load from Lowestoft to the NG Substation at Leiston (4.1)
- 2018, 166t load from SZB to Felixstowe (4.6)

In the report there is a presumption that the size of transformer for this project is in the order of 282t (3.1).

The report also notes that the A12 Bascule and Lake Lothing Bridges are not available for heavy loads (4.4 and 4.5) and that the future of Belvedere Yard (on the south side of Lake Lothing) may not be secure (2.4.6).

The SCC Structures Team have provided a summary of the authorities position regarding highway structures and AILs:

“Suffolk County Council manages all its highways structures on a risk based approach as documented in the ACOP ‘Well-Managed Highway Infrastructure’. We undertake a programme of Inspections, Structural Reviews, Assessments and manage our substandard structures broadly in accordance with CS 470. However, this means that structures may be subject to abnormal load restriction with limited notice following the result of assessment to CS 458 either qualitatively or quantitatively following Structural Reviews, Assessments or as interim measures in accordance with CS 470.

While part of the proposed ‘Designated HGV Delivery Routes’ follows the historic HR100 route in part, this has not been maintained by the DfT and along with other structures on our network the condition and hence capacity of structures on this route have gradually deteriorated over time. The Council maintains our network for the movement of vehicles complying to the [Road Vehicles \(Construction & Use\) Regulations 1986](#) (C&U) Regs and the [Road Vehicles \(Authorised Weight\) Regulations 1998](#) (AW) Regs. and does not currently have any C&U structural weight restrictions on our ‘A’ and ‘B’ class network and we aim to maintain this network to accommodate C&U traffic wherever possible.

While we endeavour to manage abnormal load vehicles which don’t meet the C&U and AW Regs but can be used outside these rules under the authority of the [Road Vehicles \(Authorisation of Special Types\) \(General\) Order 2003](#) (STGO) we do not currently maintain an abnormal loads network in the County and individual movements are subject to individual notification and may be rejected as new structural information comes to light.

We can only review the movement of Special Order Vehicles having access to a current route survey and current structural reviews of the highways structures crossed by the proposed load. Our Traffic Manager will need to be assured that the movement will not have an adverse effect on normal traffic movements and the Structures Adviser will need to be assured that the load will not exceed the current structural capacity of the structures crossed.

As well as the bridge at Marlesford there are a further 54 qualifying structures identified on the proposed routes. A significant number of these will require further investigation including possible inspections, structural reviews, assessments and load mitigation works.”

Highway Structural Capacity (Carriageway)

The Wynns report draws attention to the road crust (6.4.1). With the exception of parts of the A12 the local road network has evolved over time with few sections being reconstructed to accepted design standards. The B1122 between Yoxford has been strengthened on occasion such as construction of SZB, but no details are available. Full depth reconstruction of the A1094 between the B1069 and Aldeburgh @2007 revealed pavement construction of around 200mm (personal observation). Common defects on local roads are over-running of verges and edge deterioration due to lack of edge restraint (ie kerbs).

Level Crossings

It is noted that Network Rail have not raised any specific concerns about the load bearing capacity of the level crossings on the A12 at Darsham and the B1122 at Middleton (8.1.16). The LHA has a concern that while the A12 level crossing has laybys for large loads to pull off the carriageway while awaiting to cross the rail line the level crossing on the B1122 does not. This may result in large loads requiring to stop on the live carriageway. As part of any method statement the LHA would expect a contractor to put measures in place to avoid this, which has presumably been the case for historic movements.

The LHA notes the following in Leiston which may affect AIL movements

- Abbey Road, Leiston, potential traffic islands associated with a residential development.
- Level Crossing on Station Road, Leiston, adverse camber over tracks.
- Park Hill, pinch point <5.5m under footbridge.
- Haylings Road Leiston, narrow section of carriageway <5.5m flanked by narrow footways.

POSITION: That the ExA is aware that while the transport impacts are not severe enough nor unacceptable in highway terms for the LHA to object to the development there are negative impacts resulting from movement of large loads between Leiston and Friston. This would be exacerbated if additional substation sites relied on the same route.

To move large loads on this part of Suffolk’s highway network will require considerable planning particularly with regard to the strength of structures. While processes are in place to manage this the scale of impacts associated with making the roads suitable for these movements is unknown, nor is the potential of any legacy for later movements.

d) Need for additional works at Marlesford

For clarity this section is assumed to refer to the A12 Marlesford bridge works and not the A12 Pedestrian Amenity mitigation (which is addressed in Agenda Item 3(a)).

The LHA welcomes the additional information regarding the potential scope of work that may be necessary to temporarily strengthen Marlesford Bridge in paragraph 80 of the OCTMP (REP 6-010).

POSTION: LHA remaining concern is disruption to the A12 that any temporary strengthening work will cause although is satisfied this can be managed through existing consultation / permit processes.

e) Good planning and integration – consequential effects

Good planning and integration require a clear understanding of what projects are coming forward and when. Due to the lack of clarity with regard to the likelihood of future energy projects in East Suffolk it is difficult for the LHA to plan a coherent transport strategy to support this. In the example of EA1(N) and EA2 it primarily the access to what may be an expanding number of substations located at Friston and the resilience of the local highway network to support them. We propose this matter is discussed in more detail in agenda item 4e.

Agenda Item 3: Local freight strategy – construction and operation

a) Marlesford: need for and extent of works, assessment of impacts post consent

For clarity this section is assumed to refer to the A12 pedestrian amenity mitigation and not the A12 Marlesford bridge works (which is addressed in agenda item 2 (d)), as set out paragraph 5.6 of SCC's Deadline 5 response (REP5-055), the Applicants' have identified a cumulative impact on Pedestrian Amenity, with Sizewell C, through Marlesford. Sizewell C Co. have not proposed any mitigation at this location to date as part of their Application. The Council are in-principle in agreement with the need for works at this location and have agreed indicative details of a scheme that mitigates their proportional impact at this location. An overarching s278 agreement has been signed (24/03/2021 for this, the three other mitigation schemes at Theberton , Yoxford and Snape together with the safety scheme at the A12/A1094 junction at Friday Street.).

b) A12/A1094 Friday Street junction update

As set out at Paragraph 5.11 of our Deadline 5 Response (REP5-055), and the comments on Applicants' Response to ExQ2, 2,.18.1 to 2.18.4 (REP7-076) the Council is satisfied with the concept design for the A12 / A1094 signal scheme. SPR have committed to this in Changes to Mitigation Measures Tracking List (REP7-040) and the Outline Construction Management Plan 3.1.2 (REP6-010)

SCC Position: SPR have committed to this in Changes to Mitigation Measures Tracking List (REP7-040) and the Outline Construction Management Plan 3.1.2 (REP6-010). An overarching s278 agreement to enable delivery of these works (if consented) has been agreed between SCC and SPR. This is in the process of being signed by both parties.

c) HGV in Aldeburgh and Leiston

Table 2.2 forecast daily HGV movements to/from accesses 5 and 6 (B1122 Aldringham) is 7 per day (scenario 2) and 10 (scenario 1). This compares with 139 HGVs recorded by ATCs (i.e. the baseline) using link 10 the B1122 from Aldeburgh to the B1353 Table 26.12 (APP-074 and REP6-009).

SCC Position: Provided that the number of construction vehicles is controlled to these numbers and that the route is not used by many AILs, the LHA does not foresee the construction traffic causing significant problems on the B1122.

As per the Council's historic responses, including Paragraphs 2.19 and 2.34 of our Deadline 7 Response (REP7-076) on the OCTMP, concerns around potential impacts of HGVs and AILs outlines the importance of having robust monitoring and controls on the assessed links including the capability to monitor HGV routing and a commitment to vehicle flows on links not exceeding those set out at Table 2.1. The LHA has stated (REP7-076 paragraph 2.34) a preference for the use of GPS tracking of HGVs as part of the OCTMP control measures given in section 2.2. However, the authority recognises that there may place small haulage firms at a disadvantage due to the cost of such equipment. Notwithstanding this the LHA will expect the monitoring regime agreed in the final CTMP to be robust so that compliance with HGV numbers and routing is demonstrated.

d) HGV on A1094

As part of their Outline Construction Traffic Management Plan (REP6-009) the applicant indicates the maximum daily HGV movements along the A1094 between the A12 and B1069 are 256 (total with workers movement 339). The baseline figures are 8082 vehicles, 420 HGVs (2023)

As per the Council's historic responses, including Paragraphs 2.19 and 2.34 of our Deadline 7 Response (REP7-076) on the OCTMP, concerns around potential impacts of HGVs and AILs outlines the importance of having robust monitoring and controls on the assessed links including the capability to monitor HGV routing and a commitment to vehicle flows on links not exceeding those set out at Table 2.1.

e) AIL and HGV via Yoxford and Lovers Lane

Notwithstanding the LHA's response on AIL routes, specifically HR100, the use of the B1122 from Yoxford to Sizewell B is an accepted access route for large vehicles. As per the Council's historic responses, including Paragraphs 2.19 and 2.34 of our Deadline 7 Response (REP7-076) on the OCTMP, concerns around potential impacts of HGVs and AILs outlines the importance of having robust monitoring and controls on the assessed links including the capability to monitor HGV routing and a commitment to vehicle flows on links not exceeding those set out at Table 2.1 and that the proposed mitigation is provided before significant construction movements begin.

In the LHA's (REP6-092) response to 'Responses to ExA's Further Written Questions (ExQ2) section 2.18.14.a)' we stated that we would have reservations if HGV traffic were routed through Yoxford, Leiston and Knodishall as this would require them to pass through significantly larger residential areas than using the A1094.

As the majority of traffic is likely to arrive and depart to the south this will also result in a significantly longer journey with traffic having to travel via Yoxford to reach the main construction access on the B1069 south of Knodishall.

- A12/A1094 to Knodishall via A1094: 7km
- A12/A1094 to Knodishall via Yoxford and Leiston: 20km (+13km)
- A12/B1122 to Knodishall via Yoxford and Leiston: 11km
- A12/B1122 to Knodishall via A12 and A1094: 16km (+5km)

f) Need for Friday Street improvements

The Council continues to maintain our position as set out at Paragraph 21.12 and Paragraphs 21.40 to 21.46 of our Joint Local Impact Report (REP1-132) that more significant mitigation works were required than those proposed within the original DCO submission (i.e. the speed limit reduction, signage and rumble strips proposals).

The Applicants' assessment identified that the proposed increase in right turning vehicle movements at this location would exacerbate the pre-existing road safety issue to the extent that it requires mitigation.

As indicated in our historic responses, given a number of considerations, including the modelled increase in delay for right turning vehicles, the relative effectiveness of speed reduction and the increase in HGV movements undertaking movements at this location, the Council remains of the opinion that the originally proposed mitigation may not reduce the risk of an increase in frequency or severity of accidents to an acceptable level and is therefore considered to be unacceptable.

SCC Position: This issue is considered to be resolved assuming that the subsequently proposed traffic signal scheme is delivered (unless made unnecessary by delivery of the Two Village Bypass, if permitted).

g) B1353 crossing – residual concerns

The LHA **accepts** the proposals for a crossing point on the B1353 (drawing TP-PB4842-PR007 Rev D0.5 REP6-010) and considers it a preferable solution than providing an access. The visibility for construction approaching the crossing needs to be confirmed and shown on the drawing. As part of any agreement with the LHA there will be a requirement to monitor the crossing and for the Applicant to undertake any actions the LHA considers necessary to maintain and operate this safely.

h) Accesses to cable route section 3b)

The layout of the access to cable route area 3b off the B1121 Aldeburgh Road is acceptable to the LHA although as large vehicles enter the opposite carriageway particularly from the east (access 5) turning south we would recommend that traffic on the B1122 and entering /leaving the site is controlled by temporary traffic signals. Widening of the road to allow large vehicle to avoid this conflict would result in considerable removal of roadside hedges and trees.

i) Good design – mitigation and legacy

The Council notes that the proposed minor improvements at Theberton, Snape and Marlesford and Yoxford are considered to be minor transport legacy benefits of the scheme. The traffic signal scheme is not currently considered to be a legacy benefit; however, the junction will be monitored to enable an evidenced decision to be made at the end of the last construction period. Please refer to our response at Paragraph 5.13 at to REP5-055.

AGENDA ITEM 4: CUMULATIVE EFFECTS

A) CUMULATIVE EFFECTS

The LHA responded to the Applicants' Deadline 6 submission (REP6-043) at Deadline 7 (REP7-076). As per Paragraph 2.2 of our response, the Council disagrees with the decision to scope out those links originally scoped out based on the Projects' impacts. However, we have considered that this is unlikely to affect the overall conclusions.

The Council welcomes the proposals to mitigate the Projects' proportional impacts at Marlesford and Yoxford in a cumulative scenario with Sizewell C.

As set out at Paragraph 21.59 of the Joint Local Impact Report (REP1-132), the Guidance of the Environmental Assessment of Road traffic recognises its own limitations regarding assessing cumulative effects stating that the *"assessment of impacts from individual projects cannot be expected to take account of the regional or global environmental effects that arise from the accumulation of many individual projects. Whilst a project-specific environmental assessment should aim to identify a cumulative effect it is felt that these can only be considered at a policy or programme level undertaken by central or local government"*. Whilst the LHA are content with the proposed mitigation, this highlights the risks associated with the assessment method particularly for cumulative assessment and the need for relevant controls and monitoring to be in place, as consistently indicated by the LHA.

B) AIL DURING CONSTRUCTION AND OPERATION

As per Appendix B of the Applicants' Outline Construction Traffic Management Plan (REP6-009); the Applicants' assessment indicates a worst-case month of three non-special order AIL movements per day in isolation.

The Construction Traffic Management Plan (CTMP) submitted by SZC Co. for Sizewell C https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010012/EN010012-002226-SZC_Bk8_8.7_Construction_Traffic_Management_Plan.pdf indicates the potential number of AIL movements associated with the development and sets out that 50 to 60% of days would have AIL movements and on average on these days there would be four deliveries.

This level of movement would have a negative impact on the operation of the highway network. Much will depend on the detailed methodology for moving the loads which is yet to be agreed. We look for the Applicant to work with the police and the highway authority to minimise these unassessed impacts.

c) Each project separately on different timescales

Within the Applicants' Deadline 6 cumulative impact assessment (REP6-043), no assessment is undertaken of a single project with Sizewell C Scenario, as it was determined that this provided the 'worst case' assessment. It is assumed on this basis that mitigation will be provided at Marlesford and Yoxford if only one Project is brought forward that coincides with the delivery of Sizewell C.

d) Both projects together on similar timescales

Notwithstanding our concerns regarding methodology and the limitations of any such assessment, we are content that a reasonable cumulative impact assessment of the worst-case Scenario of all three projects aligning has been undertaken.

e) Other projects and timescales – Sizewell B, Sizewell C, Martlesham, other NG projects at or near Friston, A12 improvements

This can be looked at in terms of the interrelationship of DCO, highway and major planning schemes at a strategic / regional level (wider-project) and the operational integration and delivery of parts of individual schemes (local-project).

Wider-project co-ordination

Permitted schemes with confirmed programme.

- Lake Lothing Third Crossing (Construction Q2 2021 to Q4 2023)

Schemes that are permitted but do not have confirmed start dates:

- Brightwell Lakes (Adastral Park). It has been assumed by Martlesham; the Examining Authority is referring to the permitted Brightwell Lakes housing scheme.

Schemes that are within the planning process and have projected timescales:

- SZC (Pre examination)
- EA1 and EA2 (Examination) Construction @2022 to 2034

Schemes that are not developed in the planning process for which little certainty is available regarding deliver times:

- A12 MRN (outline business case in preparation, submission Q2 2021, construction Q3 2023 to Q4 2025) <https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/a12-improvements/#timeline>
- A12 Saxmundham Development (adopted Local Plan allocation)
- Nautilus Interconnector (Pre-application)
- Eurolink Interconnector
- Galloper Windfarm Extension
- Greater Gabbard Windfarm Extension

SCC notes that information has been recently provided to the Examination to indicate that the promoters of the Galloper Extension (Five Estuaries) and the Greater Gabbard Extension (North Falls) are no longer seeking a connection at Friston or in the Leiston area, and to that extent, SCC's concern about those particular projects interacting with the Applications is removed.

Focussed-project co-ordination (SZC, EA1, EA2(N))

SZC (Commencement estimated Q2 2022). Duration of work given in months from commencement where known.

- Sizewell B relocation (month 0 to 30)
- FMF A12/A14 Seven Hills (month 6 to 18)
- South Park and Ride (month 12 to 24)
- North Park and Ride (month 18 to 36)¹
- A12/A1094 roundabout (month 0 to 6)^{1,2}
- 2VBP (southern roundabout connection to A12), (month 0 to 24)^{1,2}
- SLR (A12 roundabout, connections to B1122 at Middleton Moor, B1125 and east of Theberton, B1125 junction), (month 6 to 36)^{1,2}
- A12/B1122 Yoxford Roundabout(month 0 to 6)^{1,2}
- B1122 Main site entrance^{1,2}
- B1122 Abbey road level crossing^{1,2}
- B1122 Abbey Road / Lovers Lane junction^{1,2,3}
- Lovers Lane improvements (secondary site access, realignment, household waste site, access into LEEIE, bridleway crossings)^{1,2,3}
- B1078 corridor / Wickham Market (month 6 to 18)
- Leiston Town Centre
- A12/B1119 junction improvements (month 6 to 18)^{1,2}
- A12 / A144 junction improvements (month 24 to 36)^{1,2}
- Mitigation for local impacts (Marlesford, Little Glemham, others TBC)^{1,2}

SPR

- A12/A1094 Friday Street Mitigation Scheme^{1,2}
- B1122 Theberton Mitigation Scheme^{1,2}
- A1094 Snape Mitigation Scheme²
- A12 Yoxford Mitigation Scheme^{1,2}
- A12 Marlesford Mitigation Scheme^{1,2}
- Temporary site accesses on Sizewell Gap (2 No)^{1,2,3}
- Temporary site accesses (B1069 Knodishall, B1122 Aldringham)²
- Crossing Points (B1353 Aldringham, Grove Road Friston)
- Permanent site access (B1121 Friston)
- A12 Marlesford Bridge^{1,2}

Notes

- 1: Impact on HGV routes for SZC
- 2: Impact on HGV routes for EA1(N) and EA2
- 3: Impact on access to SZB

As part of their DCO submission SZC Co. Submitted an 'Implementation Plan', which indicates the above provided timescales for highway works based on the final investment decision.

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-002217-SZC_Bk8_8.4_Planning_Statement_Appxl_Implementation%20Plan.pdf

The level of disruption caused by all these works is not yet known and will vary across the infrastructure, but in all cases as a minimum will involve tying in with the highway network, which will incorporate traffic management impacting upon the Projects, as well as background traffic. An assessment of the impacts of the delay associated with has not been undertaken. We will continue to press for as much foresight on these works as possible to ensure minimising these impacts.

SCC Position: The LHA is finding that the number of NSIPs and other projects coming forward on the east coast of Suffolk is placing a strain on its ability to manage and minimise the impact on the transport network. Specifically, the disruption of the construction phases and associated highway mitigation has to be managed in a way that minimises disruption to the residents and economy of Suffolk and the region.

The LHA position is that the cumulative impacts of all these schemes should be considered in the planning process and for planners, applicants and the highway authorities to cooperate in delivering the optimal solution. For example, this may result in joint delivery or early start of mitigation schemes to avoid creating adverse impacts on construction routes e.g. Marlesford, Theberton, Snape.

f) Assessment methodology and planning obligations

Planning obligations

In the LIR (21.123) the LHA stated that agreements or obligations were required to cover:

- 1) Additional costs for cyclic and routine maintenance: not resolved.
- 2) Structural surveys of highway condition and remedial work as required (included in OCTMP REP3-033 section 4.1.4): No further action required.
- 3) Fees for s278 technical approval and inspection of highway works. Can include any costs associated with speed camera: in discussion with applicant.

- 4) Costs speed limit changes (temporary or permanent): as not included in DCO, powers remain with LHA so applicant will have to follow existing LHA processes. No further action required.
- 5) SCC's costs for monitoring the CTMP and WTP: not resolved.
- 6) Costs associated with AIL movements: The Applicant will have to follow existing LHA processes. No further action required.
- 7) Stratford St Andrew AQMA monitoring: see ESC response but understood to have been resolved by applying proportional controls to EURO classification of HGVs.

Position: An overarching s278 agreement to enable delivery of these works (if consented) has been agreed between SCC and SPR. This is in the process of being signed by both parties.. Discussions on a planning agreement to resolve the authority's other concerns are well advanced and provided that the LHA comments on the OCTMP and OAMP are accepted by the Applicant should be resolved by deadline 9. Until such time as this is agreed the LHA position on protective provisions remains.

Update 25/03/2021: A revised OCTMP version 4 was provided to the LHA today and we are working with the Applicant to agree the final details The overarching s278 agreement has been sealed today (25/03.2021) and with application of the same OCTMP Pplanning agreement criteria to the OAMP this would remove the authority's requirement for protective provisions.

g) Mitigation legacy - the four-village bypass scheme

The SCC view is that a four-village bypass would, in our view, have provided significant legacy benefit to the area and not just for SZC construction but we consider it unnecessary for the SPR projects on their own. The 4VBP would provide benefits to the regional economy including the energy sector and support East Suffolk's Local Plan. Details of the 4VBP (Suffolk Energy Gateway) bid can be found at <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/consultations-and-studies/> This Outline Business Case (OBC) submission to the Department for Transport (DfT) was unsuccessful, in part due to the uncertainty of any contribution from EDF.

The fundamentally issue with the 4VBP is that there is no longer time to build it in advance of EDF Energy's peak period of construction unless there is a significant change in the SZC DCO. It is extremely unlikely that DfT would fund a road improvement such as 4VBP taking place in the middle of the SZC construction. It is equally unlikely that EDF Energy would make a contribution to the 4VBP scheme if the construction could not take place in time unless there is a substantial delay of Sizewell C.

Response to ISH 15 'Draft Development Consent Order'.

Agenda Item 2: Progress Position Statement by the Applicant: Changes to the Drafts in Progress since ISHs9

LHA comments on dDCO were submitted at Deadline 7 (REP7-007).

General comment on article 14 agreements with street authorities. The word 'may' remains in this article contrary to the guidance on drafting development consent orders version 2 July 2018 in introducing an ambiguity with regard to the Applicants relationship with the LHA in terms of agreements.

For Requirement 30: Onshore decommissioning we welcome inclusion of LHA as consultee.

The LHA notes the protective provisions for EDF Energy (Part 7) and NNB (Part 8). In particular the LHA notes that the undertaker will consult with NNB regarding interaction between the two parties with work on Sizewell Gap, A1094 Snape Road and A12/A1094 Friday Street. Schedule 17- Part 2: Other documents to be Certified.

The LHA responded in Deadline 7 (REP7-076) requesting minor amendments to the OCTMP and OAMP. Therefore, it expects that:

- 8.9 REP6 - 009 Outline Construction Traffic Management Plan
- 8.10 REP6 - 011 Outline Access Management Plan

Will be updated to refer to the most recent document submitted to the Examiner. The LHA agreement of LA-031 in the statement of common ground is conditional on this matter.

Agenda Item 3: Protective Provisions Progress

The LHA position (REP6-086) remains that protective provisions are required to protect its position unless the issues raised in the LIR are resolved by other means.

However, considerable progress has been made on:

- S278 agreement for the offsite highway works
- A planning agreement secured through the OAMP and OCTMP.

Since ISH13, there have been further productive discussions, such that an overarching s.278 agreement is in the proceed of being agreed and there has been useful engagement with the Applicants on the scope of a planning agreement, which is expected to be entered into as part of discharging the requirements in relation to the OCTMP and the OAMP. However, until such time as an agreement is in place, SCC maintains its position that protective provisions are needed to ensure that the LHA's highway infrastructure and highways assets are adequately protected without imposing additional costs on SCC (which are indirectly borne by the local communities). SCC is therefore putting forward protective provisions at Deadline 8 which it asks to be included in the draft DCO.

Update 25/03/2021: A revised OCTMP version 4 was provided to the LHA today and we are working with the Applicant to agree the final details. The overarching s278 agreement has been sealed today (25/03.2021) and with application of the same planning OCTMP agreement criteria (when agreed) to the OAMP this would remove the authority's requirement for protective provisions.

Agenda Item 5: Agreements and Obligations: Progress

See the LHA's response to agenda item 3, provided above.

2. Responses to ExA's Further Written Questions (ExQ3) (if required)

2.1 Not applicable.

3. Comments on the Report on the Implications for European Sites (RIES) (if required)

3.1 Not applicable

4. Final Statements of Common Ground (SoCG) and Commonality requested by the ExA under Procedural Decision 15 (Annex F) also listing matters not agreed (in circumstances where a SoCG could not be finalised).

4.1 The LHA understands that the Applicant will submit the SoCG between the two parties at deadline 8. This document is well advanced although agreement of LA-031 and LA-033 are conditional on the proposed changes in the LHA deadline 7 response being accepted by the Applicant and documents updated to reflect these.

5. Comments on any additional information/submissions received by Deadline 7

5.1 Not applicable.

6. Responses to any further information requested by the ExAs for this deadline

6.1 Issue Specific Hearings 13 (ISHs13): Hearings Action Points

1. Abnormal Indivisible Load access: Statement report of the Council Structural Team

"Suffolk County Council manages all its highways structures on a risk based approach as documented in the ACOP 'Well-Managed Highway Infrastructure'. We undertake a programme of Inspections, Structural Reviews, Assessments and manage our substandard structures broadly in accordance with CS 470. However, this means that structures may be subject to abnormal load restriction with limited notice following the result of assessment to CS 458 either

qualitatively or quantitatively following Structural Reviews, Assessments or as interim measures in accordance with CS 470.

While part of the proposed 'Designated HGV Delivery Routes' follows the historic HR100 route in part, this has not been maintained by the DfT and along with other structures on our network the condition and hence capacity of structures on this route have gradually deteriorated over time. The Council maintains our network for the movement of vehicles complying to the Road Vehicles (Construction & Use) Regulations 1986 (C&U) Regs and the Road Vehicles (Authorised Weight) Regulations 1998 (AW) Regs. and does not currently have any C&U structural weight restrictions on our 'A' and 'B' class network and we aim to maintain this network to accommodate C&U traffic wherever possible.

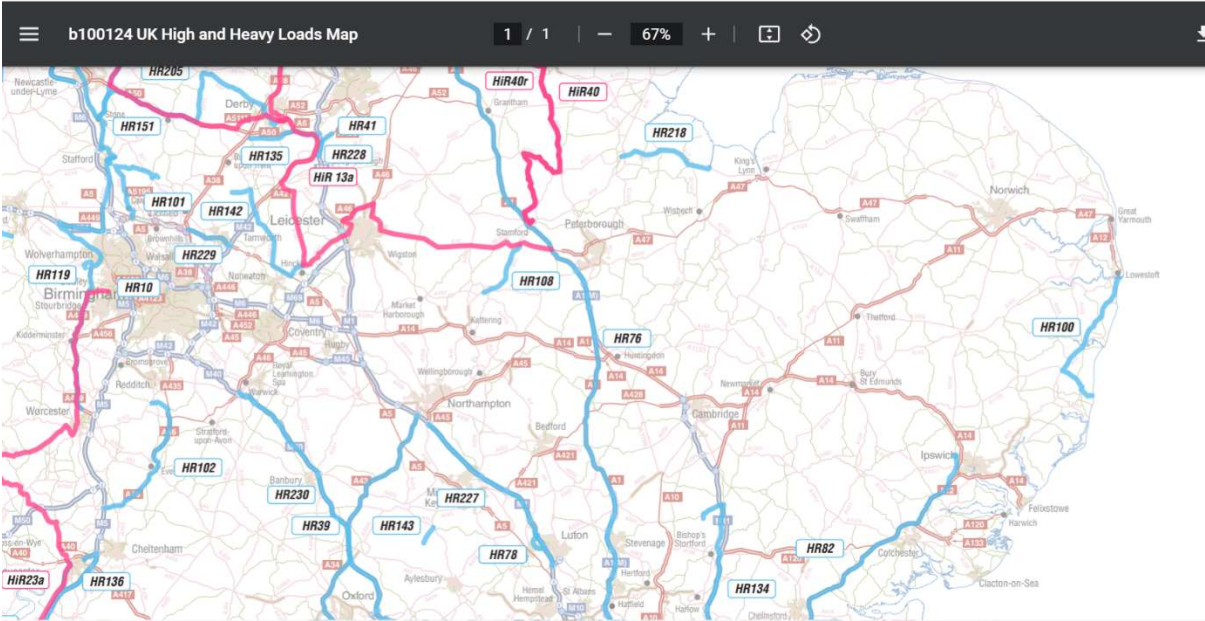
While we endeavour to manage abnormal load vehicles which don't meet the C&U and AW Regs but can be used outside these rules under the authority of the Road Vehicles (Authorisation of Special Types) (General) Order 2003 (STGO) we do not currently maintain an abnormal loads network in the County and individual movements are subject to individual notification and may be rejected as new structural information comes to light.

We can only review the movement of Special Order Vehicles having access to a current route survey and current structural reviews of the highways structures crossed by the proposed load. Our Traffic Manager will need to be assured that the movement will not have an adverse effect on normal traffic movements and the Structures Adviser will need to be assured that the load will not exceed the current structural capacity of the structures crossed.

As well as the bridge at Marlesford there are a further 54 qualifying structures identified on the proposed routes. A significant number of these will require further investigation including possible inspections, structural reviews, assessments and load mitigation works."

Abnormal Loads Map

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/360533/High and Heavy Load Grids Map for Abnormal Loads.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/360533/High_and_Heavy_Load_Grids_Map_for_Abnormal_Loads.pdf)



https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/360539/Heavy_Load_Grid_for_Abnormal_Loads.pdf

Safe roads, Reliable journeys, Informed travellers

HEAVY LOAD GRID ROUTES

82	D	M25(J28)/A12 (Brook Street) to Bramford (Substation)
88	D	Devonport (R43/6) to Ellbridge (Saltash) (Landulph Substation)
93	C	Tilbury (Docks) to Bexley (Substation)
95	D	London (A110 Chingford) to Holyfield (Sub Station)
97	F	M4 (J2) to Byfleet (Substation)
99	D	Shoreham-By-Sea (Docks) to Bolney (Substation)
100	D	Lowestoft (Docks) to Sizewell (Nuclear Power Station)
101	F	Cannock Chase (A5/A460) to Rugeley (Site)
102	E	M5(J9) (Worcester) to Feckenham (Substation)
103	C	Elstree (M1/A41) to Elstree (Substation)
104	C	Liverpool (Docks) to Netherton (Site, Rolls Royce)
107	D	Hull (Docks) to Cottingham (Substation)
108	D	Duddington (A47/A43) to Corby (Substation)
114	E	Chester (A41/A55) to Talwrn (Substation)
118	D	Port Penrhyn (Dock) to Pentir (Pentir)
119	F	Merry Hill (Langley Rd) to Penn (Substation)
126	D	Shoreham-By-Sea (Docks) to Ninfield (Substation)
131	F	A1(M)J45 (Dishforth) to Osbaldwick (Substation)
134	E	Walthamstow (A104/A114 - London) to Stocking Pelham (Substation)
135	D	M1 (J24a) to Willington East (Substation)
136	D	Quedgeley (A38/A430) to Walham (Substation)
139	D	Hounslow (A4/A30) to Iver (Substation)
139B	D	Hounslow (A4/A30) to Iver (Substation)
142	D	Hinckley (A47/A5) to Drakelow (Power Station Closed)
143	D	Winslow (A413) to East Claydon (Substation)

HEAVY ROUTE 100 Lowestoft to Sizewell

From Lowestoft, Docks to Sizewell, Nuclear Power Station

Weight Group:D Height Limit:H

100/1		Exit Docks from South Quay	Suffolk County Council (13/4/2006), Suffolk Constabulary (11/5/2006)
100/2	TL	A146 Victoria Rd, Waveeney Drive, Horn Hill, Pier Terrace, Belvedere Road	Suffolk County Council (13/4/2006), Suffolk Constabulary (11/5/2006)
100/3	TL	A12 Royal terrace, Marine Parade, Kirkley Cliff Rd, Kensington Rd, London South Rd, London Rd, Parkfield, London Rd, High St, London Rd, Main Rd	Suffolk County Council (13/4/2006), Suffolk Constabulary (11/5/2006)
100/4	TL	B1122 Middleton Rd (Yoxford), Yoxford Rd, Leiston rd	Suffolk County Council (13/4/2006), Suffolk Constabulary (11/5/2006)
100/5	TL	C228 Lover's La, Sizewell Gap	Suffolk County Council (13/4/2006), Suffolk Constabulary (11/5/2006)
100/6	TL	Into Sizewell Nuclear Power Station	Suffolk County Council (13/4/2006), Suffolk Constabulary (11/5/2006)

Heavy and High Routes

	Motorway	All purpose
		S/cw D/cw
Highways Agency Trunk Road		
Non-Highways Agency A-Road D/cw		
Non-Highways Agency A-Road S/cw		
Non-Highways Agency B-Road		
Heavy Load Route		
High Load Route		

Classification	12 Axles - Gross Trailer Weight	14 Axles - Gross Trailer Weight
A1	406.04T	480.60T
A	325.12T	360.68T
B	280.42T	315.98T
C	269.24T	304.80T
D	264.16T	299.72T
E	259.08T	294.64T
F	223.52T	259.08T
M25	300,000kg on 12 Axles	

High Load Grid Routes: 18' or 20' vehicle running height.

Full details of the classification vehicle's configurations are available from the Highways Agency. Routes on this map should not be taken as permission to move. The correct notification process must still be followed

abnormal.loads@highways.gsi.gov.uk

AP10. Cumulative effects – methodology and planning obligations

A joint response has been provided in the statement of common ground that is being submitted by SPR. LA-038 to LA-042 contain the relevant statements.

6.2 Issue Specific Hearings 15 (ISHs15): Hearings Action Points

AP4. Quality assurance of Schedules with local content.

No further issues have been noted in schedules 2 to 7 inclusive.