



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 4 – 13 January 2021

Comments of Suffolk County Council as Local Highways Authority

1. Comments on the Applicant's revised draft Development Consent Order

- 1.1 Interpretation: The LHA does not object to the removal of the 'highway alterations 'from the 'onshore preparation works' provided that similar controls to those proposed in the Construction Transport Management Plan are applied.
- 1.2 Part 3: Streets, schedule 12 Access to Works: The LHA does not object to being the approving authority.
- 1.3 Schedule 1: Part 3 Requirements: schedule 16 Highway Access: The LHA does not object to being the approving authority.
- 1.4 Schedule 1: Part 3 Requirements: schedule 28 Traffic: The LHA does not object to being the approving authority.
- 1.5 Schedule 1: Part 3 Requirements: schedule 36 Port Traffic: The LHA does not object to being the approving authority although it notes that the port may be in neighbouring authorities who may have a differing position.
- 1.6 The period allowed for the discharge of requirements is considered to be insufficient and unreasonable, as is the requirement to request additional information within a certain time period and also the deemed consent if requirements are not discharged within time.

2. Comments on any revised/updated Statement of Common Ground (if any).

- 2.1 Not applicable.

3. Comments on any additional information/submissions received by Deadline 3.

Deadline 3 Submission - ExA.AS-9.D3.V1 EA1N&EA2 Traffic and Transport Clarification Note for Deadline 3 - Version 01: REP3-055

- 3.1 Please refer to the Councils joint Local Impact Report regarding the acceptability or otherwise of the off-site highway works. This clarification note does not materially change the Local Highway Authority (LHA) position.
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002772-DL1%20-%20Suffolk%20County%20Council%20-%20LIR.pdf>
- 3.2 The LHA notes that road authorities and undertakers must comply with the Safety at Streetworks and Roadworks: A Code of Practice https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/321056/safety-at-streetworks.pdf is applicable to most local authority roads whilst Chapter 8 of the Traffic Signs Manual (Department for

Transport, 2009) is primarily for high speed roads such as the strategic road network.

- 3.3 The code of practice states that 'the desirable width for shuttle working with normal traffic (i.e. including buses and HGVs) lies between 3.25 and 3.5 m. This range avoids certain widths that create opportunities for unsafe overtaking of cyclists, and is based on Department for Transport guidance'. The code of practice does state that for shuttle working the absolute minimum width is 3.0m for normal traffic.
- 3.4 In paragraph 6 a safety clearance of 0.5m is quoted. While correct for roads with speed limits of 40mph or less a sideways safety zone of 1.2m is required for higher speeds.
- 3.5 A working width of 2.5m (paragraph 2.5m) is likely to prevent slewing of excavators when loading or unloading construction vehicles and will require drivers of large vehicles to exit onto the verge. Reduction of the working area to 1.5m would likewise prevent most mechanical plant from operating within the carriageway and hence would have to work from the verge or within the site. This method does not allow for the impact on footways and cycleways adjacent to the carriageway when a minimum of 1.0m width must be maintained. The LHA would ask that the applicant confirms they have considered these matters in their proposals.
- 3.6 The LHA notes that using the method proposed in paragraph 20 a 6.0m wide road would need to be widened on either side to enable an open cut trench to be cut and backfilled. This may cause a problem on Sizewell Gap (access 1 and 2) where a shared footway / cycleway is present along the south side and the B1122 at Aldringham (access 5 and 6) where a footway is present on the western side. The LHA preference remains HDD or similar methods.
- 3.7 In summary the LHA has doubts about the practicality of the proposed traffic management. However, with the exception of Sizewell Gap that forms the sole access to Sizewell B the authority would consider short duration closures of roads.
- 3.8 The comments made in 4.1 to 4.6 are also applicable to the proposals in paragraph 23 to 27, although if temporary road closures are considered on the A1094 it is likely that restrictions on working during the day or peak hours are likely to be imposed as this road is the main route into Aldeburgh.
- 3.9 It is unclear what level of vehicular access will be provided for residents of Church Road. Church Road is a public footpath but it is proposed that this will be temporarily closed and diverted. What arrangements will be provided to allow residents to access their properties.
- 3.10 Temporary alterations of speed limits will require enactment of temporary traffic regulation orders through s14 of the Road Traffic Regulation Act 1984

<https://www.legislation.gov.uk/ukpga/1984/27/section/88>. Section 15(1) states that temporary speed restrictions cannot exceed 18 months duration unless the authority is satisfied that the works will take longer to execute and states this on the order, as per Section 15(2). The authority will require that at the time the applicant requests an order that the current program of works is submitted so that the duration of the order can be realistically determined. Further details are found on the SCC website although these presume temporary restrictions are not extended beyond 18 months <https://www.suffolk.gov.uk/roads-and-transport/roadworks/apply-for-a-temporary-road-closure/>

3.11 Drawing TP-PB4842-DR003 for access 2 shows the edge of the carriageway tight against the red line boundary. The LHA would suggest the applicant satisfies themselves that enough room has been allowed for construction of the carriageway.

3.12 Drawing TP-PB4842-DR011 shows a small area east of access 9 where the visibility splay is outside the red line and also the highway boundary. The applicant will need to demonstrate that the visibility can be achieved and maintained for the duration of the project(s) so that safe access to the site can be achieved.

Deadline 3 Submission - 8.9 Outline Construction Traffic Management Plan (Tracked) - Version 02: REP3-033

3.13 The LHA notes that the OCTMP scope (e.g. paragraph 9) does not include Onshore Preparation works and that this item has been removed from the glossary. The LHA is concerned that this will remove any controls on construction vehicles involved in Onshore Preparation Works, which includes construction and improvements of site accesses. While the LHA is not specifically concerned about the quantity of movements it would prevent controls being applied to timing or routing of construction vehicles and requests relevant controls are included.

3.14 The OCTMP should include a commitment that details of the Transport Co-ordinator (TCO) and any subsequent change in postholder shall be submitted to the LHA and Local Planning Authority (LPA) with a reasonable time from appointment (say 20 working days).

3.15 The LHA welcomes the proposal for a community liaison officer at paragraph 22.

3.16 Prior to the Deadline 3 submission Table 2.1 originally set out a useful summary of HGV movements assessed across the local road network and not just the proposed accesses which forms the current version of the table. For monitoring purposes it is the LHA opinion that the table should be retained in its original form (therefore, as submitted in the original DCO submission) whereby HGV movements would be controlled to the impact on links as assessed within the Environmental Statement.

3.17 Further to this, the LHA recommends a separate table is included showing the maximum permitted HGV movements at each access to ensure compliance with the assessed numbers as stated at paragraph 36.

Option 1	EA1(N) or EA2: Scenario 2	EA1(N) and EA2: Scenario 1
Accesses 1 and 2 Sizewell Gap	115	152
Accesses 5 and 6 B1122	7	10
Accesses 9 and 10 (B1069)	205	255
Total daily movements across all accesses	210	270

or

Option 2	EA1(N) or EA2: Scenario 2	EA1(N) and EA2: Scenario 1
Accesses 1 and 2 Sizewell Gap	115	152
Accesses 5 and 6 B1122	7	10
Accesses 9 and 10 (B1069)	205	255
A12 north of B1122	210	270
A12 between B1122 and A1094	210	270
A12 south of A1094	210	270

And to clarify roads on which no HGV movements are permitted

Both Options	EA1(N) or EA2: Scenario 2	EA1(N) and EA2: Scenario 1
B1121 from the A12 to Friston	No HGV movements	
B1121 to the A1094		
Aldringham Lane		
B1122 south of Lovers Lane		
B1069 through Leiston, Knodishall and Coldfair Green		

3.18 The booking system proposed in paragraph 38 will, in isolation, not provide a robust method of monitoring as it does not record times HGVs are on the network nor which route they have taken to site. Paragraph 43 sets out that a unique identifier will be provided in the cab of the HGVs; however, this is not considered by the LHA as an effective method of monitoring nor as a method of identification to allow members of public to report an incident. The LHA notes

that as the CTMP is only implemented at commencement of construction controls such as routing of HGVs are not applicable to construction vehicles necessary for the preparation works including construction of the site accesses.

- 3.19 The HGV timings set out in paragraph 41 relate to working hours. This will not prevent construction traffic moving across the local highway network at any time of day or night, nor parking overnight on the network.

The LHA suggest alternative wording

*'In accordance with the OCoCP, submitted as part of this DCO application construction related traffic shall not use the local highway network 1 hour before or 1 hour after the standard construction hours which are
0700-1900 Monday to Friday
0700-1300 Saturday*

Construction related traffic shall not be permitted to park overnight on the Local Highway Network'

The Local Highway Network is defined as any point north of the A12/A14 Seven Hills Interchange or South of the A47 Lowestoft Bascule Bridge.

- 3.20 It is not clear in paragraph 43 what mechanism will be provided so that residents can identify if a vehicle is engaged on construction of EA1(N) or EA2 nor that such measures would be robust, relying on reports from third parties of transgressions. In the LHA's opinion a more robust method is GPS tracking, which is widely available, and it is understood likely to be used to monitor Sizewell C construction traffic. Other advantages are real time tracking which aids traffic management during incidents on the network. This would also allow monitoring of vehicles to prevent overnight parking on the local highway.
- 3.21 The LHA note that any person or persons stopping traffic on the public highway as proposed in paragraph 47 must have the relevant legal powers to do so.
- 3.22 The LHA request confirmation that all major improvements (e.g. road widening, junction modification) to highway infrastructure to allow passage of transformers, with the exception of structures, has been included within the DCO and paragraph 56 relates to minor works such as temporary removal and replacement of street lights, traffic signals and traffic islands.
- 3.23 In paragraph 146 and Table 19.28 of 6.1.19 Chapter 19 Air Quality <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-001275-6.1.19%20EA1N%20Environmental%20Statement%20Chapter%2019%20Air%20Quality.pdf> the applicant demonstrates the modelling of the air quality impacts assumes a proportion of EURO VI standard vehicles. The Councils have accepted that a sensitivity test undertaken by the applicant demonstrate that at a 70% proportion of EURO VI is a realistic scenario with acceptable impacts,

although this is subject to final agreement as part of the statement of common ground. Paragraph 59 of the revised OCTMP does not provide an adequate control regime to achieve compliance with these assumed values merely stating EURO VI standards will be adhered to as far as reasonably practicable or where possible.

- 3.24 As stated in our Relevant Representations the highway works referred to in paragraph 61 of the OCTMP are not considered acceptable to the LHA (works no 35 and 36) or lacking in detail to make an informed assessment (works 37).
- 3.25 Technical approval by the LHA (paragraph 69) will be required to any work within the public highway.
- 3.26 To clarify its position the LHA expects monitoring of HGV numbers (paragraph 76), HGV routeing (paragraphs 78 to 82) and near misses (paragraph 82) will be reported to the LHA by the TCo on a quarterly basis rather than on request (paragraph 83). SCC would ask that the monitoring reports as detailed in paragraph 89 are also made public, preferably through a SPR hosted website or alternatively by the LPA.
- 3.27 Table 4.1 "CTMP Action Plan does not include monitoring of EURO standards for HGVs. The LHA considers that if either or both EA1(N) and EA2 are constructed concurrently with Sizewell C that a formal engagement of the SPR TCo with the Sizewell Transport Review Group will be necessary so that emerging cumulative impacts can be monitored and action taken if necessary.

Deadline 3 Submission - ExA.AS-2.D3.V1 EA1N Outline Port Construction Traffic Management and Travel Plan - Revision 01: REP3-047

- 3.28 A Transport Assessment may be required by the LHA to determine the likely traffic flows associated with port activities (Paragraph 6).
- 3.29 As the LHA SCC's main concerns associated with construction activities at a port (Paragraphs 8 & 20) would include road safety, highway capacity and the presence of sustainable transport infrastructure to reduce vehicle movements and promote sustainable development. However, both noise and air quality impacts will be of interest to both SCC and ESC and the applicant should liaise with both parties on this matter.
- 3.30 The applicant quotes the National Planning Policy Framework in Paragraph 11. The NPPF in paragraph 111 in full states 'All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed'. During early discussions with SPR as LHA SCC agreed that a robust Environmental Statement could contain the information contained within a Transport Assessment. Therefore, any review such as described in paragraph 16 and 18

shall be presented in a transport assessment or, if acceptable to the examiner and local highway authority or contained within a port environmental statement.

- 3.31 It is not considered sufficient to only consider relevant Air Quality Management Areas within the confines of Suffolk as stated in paragraph 21 as the selected port may fall outside these limits.
- 3.32 Management of the PCTMP and PTP as described in paragraph 30 should be included in the role of the TCo detailed in the OCTMP with clear reporting lines from the Construction site manager, operations manager and plan co-ordinator to ensure effective co-ordination of delivery of the plans.
- 3.33 The LHA considers that the initiatives proposed in paragraph 32 to encourage modal shift should also refer to improvements in highway infrastructure where necessary and in proportion to the benefits.

Deadline 3 Submission - 8.10 Outline Access Management Plan (Tracked) - Version 02: REP3-035

- 3.34 LHA welcomes the change of the scope of the Access Management Plan to the point of commencement of the onshore preparation works as stated in paragraph 7.
- 3.35 It remains unclear how the temporary speed limits referred to in paragraph 28 are to be implemented, but the LHA presumes that the applicant will be requesting the LHA to raise temporary traffic regulation orders. The LHA requests the applicant clarifies their intentions on this matter.
- 3.36 The temporary speed limits on Sizewell Gap may require modification in terms of the extent as they need to be consistent with any similar measures proposed by EDF for Sizewell B and C projects on this road. The applicant should allow for this when finalising details of the temporary speed limits and liaise with the Sizewell B and C project teams.
- 3.37 Technical approval of accesses in paragraph 37 will be required in addition to that submitted within the DCO as additional technical details are required such as drainage and construction thicknesses and materials.
- 3.38 SCC now manages roadworks through permitting process rather than noticing (paragraph 46) and may impose restrictions on such works such as off peak working.
- 3.39 The delivery routes for HGVs (paragraph 50) would not be expected to differ from those proposed for the construction of the on shore works. The LHA's preference is for construction traffic required for the construction of the site accesses to be managed in the same way as the main construction work as detailed in the OCTMP. Additional measures are required than those listed in paragraph 51 to enable compliance with the agreed delivery plan in terms of providing contact details for the public and LHA.

- 3.40 The LHA would suggest that the communication channels referred to in paragraph 30 include modern platforms such as twitter and facebook that can provide real time information. It is also suggested that local County and District Councillors are contacted in addition to Parish Councils (paragraph 31).
- 3.41 The LHA considers that the measures in the outline CoCP should also be applicable to the construction of the site accesses forming part of the onshore preparation works.
- 3.42 Sizewell Gap will be used by Sizewell C construction traffic in the early part of the construction program. Wherever possible any work on Sizewell Gap described in paragraph 132 should also be planned to avoid peaks in construction traffic for the Sizewell B relocation or Sizewell C construction if these projects are concurrent with EA1(N) or EA2. The applicant should also liaise with the Sizewell C construction team.
- 3.43 Under the terms of SCC's S278 agreements the applicant will be responsible for the maintenance of those parts of the public highway within their site boundaries as defined by the red line. The agreement includes the applicant indemnifying the authority against any claims arising from third parties during the occupation of the 'site'. Therefore, the measures proposed in paragraph 132 will apply to all parts of the project occupying the public highway. Notwithstanding this the LHA will require access to inspect and maintain the public.
- 3.44 The applicant should note that inspections and maintenance shall extend to any associated footways, cycleways or verges within the areas under the applicant's control. This may include sweeping of footways/ cycleways in addition to carriageways. Details of maintenance standards including detail of inspection frequencies and intervention criteria can be found at <https://www.suffolk.gov.uk/assets/Roads-and-transport/how-we-manage-highway-maintenance/v2.0-HMOP-2019-Final-Live-15-07-19a.pdf>. These standards should be treated as the minimum acceptable criteria.

- 3.45 As set out at Table 26.26 of the Environmental Statement, mitigation for Driver Delay impacts at Junction 3 included measures to manage employee traffic. Further clarification is needed on how the measures outlined in Table 2.2 of the OTP specifically reduce vehicles travelling through junctions during peak periods beyond the 1.5 employees per vehicle car share that has been assessed within the Environmental Statement as it is understood that this formed the assessed impact from which additional management was deemed understood to be required.

3.46 Paragraph 50 should include a commitment by the applicant to submit the quarterly Travel Plan monitoring report to the Council and to upload onto a public website.

Deadline 3 Submission - ExA.HA.D3.V1 EA1N&EA2 Applicants Responses to Hearings Action Points (ISH1, CAH1, ISH2) - Version 01 REP3-083

3.47 In response to question 6 the applicant states '*No further information regarding cumulative traffic and transports impacts with Sizewell C is proposed*'. This appears contrary to the response at deadline 2 that acknowledged more transport data is likely to come forward as part of the SZC application and stated that '*the Applicants are also aware of recently proposed changes (Planning Inspectorate reference no. EN010012) to the SZC DCO application following engagement with SCC and other stakeholders. It is understood that a SZC DCO addendum will set out proposals for SZC to increase the import of materials by rail and sea with the objective of reducing the amenity impacts of Heavy Goods Vehicle (HGV) traffic. Once the SZC addendum becomes available, the Applicants will review the materials to determine if further updates to their CIA for the Projects are necessary. It should also be noted that at this stage it is unknown whether the changes to the SZB Relocated Facilities project are likely to alter the associated traffic flow figures contained within the SZC DCO application; the SZB traffic flow figures used for this clarification note are those contained within the SZC DCO application*'. The Council requests that additional assessment is undertaken or if not its omission is reasonably justified.

Deadline 3 Submission - 6.3.6.4 EA1N Environmental Statement - Appendix 6.4 - Cumulative Project Descriptions (Tracked) - Version 02 REP3-022

3.48 SCC would like the applicant to clarify if all 4 transition bays and 19 jointing bays will be constructed in the scenario 2 sequential construction, as in Scenario 1, as 'installation of onshore cables' reference is made to completion of EA2 requiring new joint bays apparently contradicting row 'cable jointing and jointing pits'. The latter process mirrors that for EA3 where ducting was constructed as part of EA1 but not jointing bays.

3.49 The LHA accepts that installation of ducting for the second project when delivered sequentially will be of benefit in reducing construction traffic for scenario 2 as originally presented and that the total number of construction employees will not exceed that in scenario 1.

4. Responses to any further information requested by the Examining Authority for this deadline

4.1 Not applicable.